

Appointment

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**From:** Atkinson, Emily [Atkinson.Emily@epa.gov]  
**Sent:** 12/18/2017 2:14:45 PM  
**To:** Cyran, Carissa [Cyran.Carissa@epa.gov]; Loving, Shanita [Loving.Shanita@epa.gov]; Atkinson, Emily [Atkinson.Emily@epa.gov]  
**Subject:** Meet with Hilary Moffett re: GHG Inventory (Confirmed)  
**Attachments:** Re GHG Inventory.msg; Untitled Attachment; Untitled Attachment; Friday 9 am meeting information  
**Location:** WJC-N 5415  
  
**Start:** 12/19/2017 9:00:00 PM  
**End:** 12/19/2017 9:30:00 PM  
**Show Time As:** Tentative

**Moved from 12/15 at 9am to this new date/time****New time requested by Hilary Moffett to accommodate attendees observing the Jewish holiday**

**To:** Mandy Gunasekara, David Harlow, Alex Dominguez, Sarah Dunham, Paul Gunning, Bill Irving, Melissa Weitz, Mark DeFigueiredo, Jackie Krieger, Clint Woods

**Outside Attendees (in person):**

- Hilary Moffett
- Howard Feldman (API)
- Karin Ritter (API)
- Zoe Cadore (API)
- John Wagner (API)
- David van Hoogstraaten (BP)
- Puneet Verma (Chevron)
- Marnie Funk (Shell)
- Stephen Higley (marathon)
- Angela Zivkovich (Anadarko)
- Lauri Branch (ConocoPhillips)
- Rebecca Rosen (Devon)



Re GHG  
Inventory.msg



Untitled  
Attachment



Untitled  
Attachment



Friday 9 am  
meeting informati...

## Message

To: Hilary Moffett [moffetth@api.org]

Hi Hilary,

You are confirmed for a 30 minute in person meeting on Friday, December 15, 2017 at 9:00am with Mandy Gunasekara.

Directions and procedures to 1200 Pennsylvania Avenue NW:

**Metro:** If you come by Metro get off at the Federal Triangle metro stop. Exit the metro station and go up two sets of escalators to the surface level and turn right. You will see a short staircase and wheelchair ramp leading to a set of glass doors with the EPA logo - that is the William Jefferson Clinton Federal Building, North Entrance.

**Taxi:** Direct the taxi to drop you off on 12th Street NW, between Constitution and Pennsylvania Avenues, at the elevator for the Federal Triangle metro stop - this is almost exactly half way between the two avenues on 12<sup>th</sup> Street NW. Facing the building with the EPA logo and American flags, walk toward the building and take the glass door on your right hand side with the escalators going down to the metro on your left – that is the North Lobby of the William Jefferson Clinton building.

**Security Procedures:** A government issued photo id is required to enter the building and it is suggested you arrive 15 minutes early in order to be cleared and arrive at the meeting room on time. Upon entering the lobby, the meeting attendees will be asked to pass through security and provide a photo ID for entrance. Let the guards know that you were instructed to call 202-564-7404 for a security escort.

Please send me a list of participants in advance of the meeting and feel free to contact me should you need any additional information.

Emily

Emily Atkinson  
Management Analyst/Office Manager  
Immediate Office of the Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5412B, 1200 Pennsylvania Avenue NW  
Washington, DC 20460  
Voice: 202-564-1850  
Email: atkinson.emily@epa.gov

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**From:** Hilary Moffett [mailto:moffetth@api.org]  
**Sent:** Tuesday, December 05, 2017 11:08 AM  
**To:** Atkinson, Emily <Atkinson.Emily@epa.gov>  
**Subject:** RE: GHG Inventory

Thanks Emily. I appreciate you taking a look. I want to ensure adequate respect for those celebrating the holidays so let's do the 9am for 30 minutes. Please apologize to Mandy for me! Thanks again for your flexibility.

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**From:** Atkinson, Emily [mailto:Atkinson.Emily@epa.gov]  
**Sent:** Tuesday, December 05, 2017 10:50 AM  
**To:** Hilary Moffett  
**Subject:** RE: GHG Inventory

Hi Hilary,

The best I could do is to move this up to 3pm for 45 minutes. The only other option is 9am for 30 minutes with a hard stop at 9:30am.

Please advise what could work best on your end.

Emily

Emily Atkinson  
Management Analyst/Office Manager  
Immediate Office of the Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5412B, 1200 Pennsylvania Avenue NW  
Washington, DC 20460  
Voice: 202-564-1850  
Email: [atkinson.emily@epa.gov](mailto:atkinson.emily@epa.gov)

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**From:** Hilary Moffett [<mailto:moffetth@api.org>]  
**Sent:** Tuesday, December 05, 2017 10:18 AM  
**To:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>  
**Subject:** RE: GHG Inventory

Hi Emily,

I apologize, but is there any way we could do this meeting earlier in the day? The Jewish holiday starts at sundown and a few folks that would be integral to the meeting wouldn't be able to attend. Perhaps 9am? Again, I apologize for any inconvenience.

Thanks for checking,  
Hilary

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**From:** Atkinson, Emily [<mailto:Atkinson.Emily@epa.gov>]  
**Sent:** Friday, December 01, 2017 12:05 PM  
**To:** Hilary Moffett  
**Subject:** RE: GHG Inventory

Hi Hillary,

Mandy Gunasekara has reviewed this request and asked that I setup a 45 minute in person meeting to include staff from OAQPS, Alex Dominguez and David Harlow.

It looks like we could fit this in on Friday, December 15 at 4:00pm.

Please advise if this could work on your end.

Emily

Emily Atkinson  
Management Analyst/Office Manager  
Immediate Office of the Assistant Administrator  
Office of Air and Radiation, USEPA

Room 5412B, 1200 Pennsylvania Avenue NW  
Washington, DC 20460  
Voice: 202-564-1850  
Email: [atkinson.emily@epa.gov](mailto:atkinson.emily@epa.gov)

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**From:** Hilary Moffett [<mailto:moffetth@api.org>]  
**Sent:** Wednesday, November 29, 2017 2:05 PM  
**To:** Gunasekara, Mandy <[Gunasekara.Mandy@epa.gov](mailto:Gunasekara.Mandy@epa.gov)>  
**Cc:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>  
**Subject:** FW: GHG Inventory

Hey There! Hope you had a great birthday! Let's grab Anna and go get a celebratory drink soon!!

Just wanted to circle back on this email. I just want to make sure you guys are aware of what the career team is doing on the inventory and how this could inaccurately depict emissions. This data is so important to all that EPA does, so we want to make sure it fairly represents all the effort to decrease emissions. Let me know if you have some time to chat. Alex mentioned that Emily has taken on the role of helping manage your schedule, so I've cc'd her here. I know we're asking a lot of you guys right now, so I appreciate any time you can find.

Thanks,  
Hilary

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**From:** Hilary Moffett  
**Sent:** Monday, November 20, 2017 11:20 AM  
**To:** [gunasekara.mandy@epa.gov](mailto:gunasekara.mandy@epa.gov)  
**Subject:** GHG Inventory

Hey Mandy,

I hope you had a fun trip to Germany! Are you back home for thanksgiving???

I wanted to flag an issue that is pretty important as we look toward next spring. We expect to see the the GHG inventory released in April. Some changes have been made to what is included in the inventory (namely the inclusion of gathering and boosting) that will create the appearance of increased methane emissions. We worry about how the changes here will misinform the public perception of the industry and the great work we are doing to lower emissions. Is this issue on your radar? If not, would you have Tim the week of December 11-15 for a group to come explain why the changes were made, what the outcome will be, and perhaps how we can work to preempt the inevitable issues that these changes will create.

Let me know how we can be helpful.

Thanks,  
Hilary



Message

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**From:** Hilary Moffett [moffetth@api.org]  
**Sent:** 12/11/2017 5:13:50 PM  
**To:** Atkinson, Emily [Atkinson.Emily@epa.gov]  
**Subject:** Friday 9 am meeting information

## Message

**From:** Krieger, Jackie [Krieger.Jackie@epa.gov]  
**Sent:** 12/1/2017 6:05:41 PM  
**To:** Koerber, Mike [Koerber.Mike@epa.gov]  
**CC:** Atkinson, Emily [Atkinson.Emily@epa.gov]; South, Peter [South.Peter@epa.gov]  
**Subject:** Re: GHG Inventory

Yes, thanks Mike, that is correct. Emily, invite Sarah, Paul and also Julius Banks and Mark DeFigueiredo. Thanks!

Sent from my iPhone

On Dec 1, 2017, at 12:16 PM, Koerber, Mike <Koerber.Mike@epa.gov> wrote:

Emily – Actually, OAP is responsible for the GHG inventory. I suggest you invite Sarah and Paul, rather than Steve and me.

Mike

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**From:** Atkinson, Emily  
**Sent:** Friday, December 01, 2017 12:12 PM  
**To:** Koerber, Mike <Koerber.Mike@epa.gov>; South, Peter <South.Peter@epa.gov>  
**Subject:** FW: GHG Inventory

Right now I just have Mike and Steve on this briefing – please advise if anyone else needs to be added and if you all recommend we do a prebrief for Mandy. And FYI – this is a Mandy meeting and it would not include Bill.

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**From:** Atkinson, Emily  
**Sent:** Friday, December 01, 2017 12:05 PM  
**To:** Hilary Moffett <moffetth@api.org>  
**Subject:** RE: GHG Inventory

Hi Hillary,

Mandy Gunasekara has reviewed this request and asked that I setup a 45 minute in person meeting to include staff from OAQPS, Alex Dominguez and David Harlow.

It looks like we could fit this in on Friday, December 15 at 4:00pm.

Please advise if this could work on your end.

Emily

Emily Atkinson  
Management Analyst/Office Manager  
Immediate Office of the Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5412B, 1200 Pennsylvania Avenue NW  
Washington, DC 20460

Voice: 202-564-1850  
Email: [atkinson.emily@epa.gov](mailto:atkinson.emily@epa.gov)

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**From:** Hilary Moffett [<mailto:moffetth@api.org>]  
**Sent:** Wednesday, November 29, 2017 2:05 PM  
**To:** Gunasekara, Mandy <[Gunasekara.Mandy@epa.gov](mailto:Gunasekara.Mandy@epa.gov)>  
**Cc:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>  
**Subject:** FW: GHG Inventory

Hey There! Hope you had a great birthday! Let's grab Anna and go get a celebratory drink soon!!

Just wanted to circle back on this email. I just want to make sure you guys are aware of what the career team is doing on the inventory and how this could inaccurately depict emissions. This data is so important to all that EPA does, so we want to make sure it fairly represents all the effort to decrease emissions. Let me know if you have some time to chat. Alex mentioned that Emily has taken on the role of helping manage your schedule, so I've cc'd her here. I know we're asking a lot of you guys right now, so I appreciate any time you can find.

Thanks,  
Hilary

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**From:** Hilary Moffett  
**Sent:** Monday, November 20, 2017 11:20 AM  
**To:** [gunasekara.mandy@epa.gov](mailto:gunasekara.mandy@epa.gov)  
**Subject:** GHG Inventory

Hey Mandy,

I hope you had a fun trip to Germany! Are you back home for thanksgiving???

I wanted to flag an issue that is pretty important as we look toward next spring. We expect to see the the GHG inventory released in April. Some changes have been made to what is included in the inventory (namely the inclusion of gathering and boosting) that will create the appearance of increased methane emissions. We worry about how the changes here will misinform the public perception of the industry and the great work we are doing to lower emissions. Is this issue on your radar? If not, would you have Tim the week of December 11-15 for a group to come explain why the changes were made, what the outcome will be, and perhaps how we can work to preempt the inevitable issues that these changes will create.

Let me know how we can be helpful.

Thanks,  
Hilary

Message

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**From:** Atkinson, Emily [Atkinson.Emily@epa.gov]  
**Sent:** 1/2/2018 8:44:49 PM  
**To:** Hilary Moffett [moffetth@api.org]  
**CC:** Woods, Clint [Woods.Clint@epa.gov]  
**Subject:** Confirmed 1/30 at 10am: Meeting Request

Hi Hilary,

You are confirmed for a 45 minute meeting on Tuesday, January 30, 2018 at 10:00am with Clint Woods, Mandy Gunasekara and David Harlow.

Directions and procedures to 1200 Pennsylvania Avenue NW:

Metro: If you come by Metro get off at the Federal Triangle metro stop. Exit the metro station and go up two sets of escalators to the surface level and turn right. You will see a short staircase and wheelchair ramp leading to a set of glass doors with the EPA logo - that is the William Jefferson Clinton Federal Building, North Entrance.

Taxi: Direct the taxi to drop you off on 12th Street NW, between Constitution and Pennsylvania Avenues, at the elevator for the Federal Triangle metro stop - this is almost exactly half way between the two avenues on 12<sup>th</sup> Street NW. Facing the building with the EPA logo and American flags, walk toward the building and take the glass door on your right hand side with the escalators going down to the metro on your left – that is the North Lobby of the William Jefferson Clinton building.

Security Procedures: A government issued photo id is required to enter the building and it is suggested you arrive 15 minutes early in order to be cleared and arrive at the meeting room on time. Upon entering the lobby, the meeting attendees will be asked to pass through security and provide a photo ID for entrance. Let the guards know that you were instructed to call 202-564-7404 for a security escort.

Please send me a list of participants in advance of the meeting and feel free to contact me should you need any additional information.

Emily

Emily Atkinson  
Management Analyst/Office Manager  
Immediate Office of the Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5412B, 1200 Pennsylvania Avenue NW  
Washington, DC 20460  
Voice: 202-564-1850  
Email: atkinson.emily@epa.gov

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**From:** Hilary Moffett [mailto:moffetth@api.org]  
**Sent:** Tuesday, January 02, 2018 2:52 PM  
**To:** Atkinson, Emily <Atkinson.Emily@epa.gov>  
**Cc:** Woods, Clint <Woods.Clint@epa.gov>  
**Subject:** RE: Meeting Request

Hi Emily,

That would work great – thank you. I will send you a list of attendees ahead of time, along with any handouts we plan to use.

Happy New Year!  
Hilary

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**From:** Atkinson, Emily [<mailto:Atkinson.Emily@epa.gov>]  
**Sent:** Tuesday, January 02, 2018 2:14 PM  
**To:** Hilary Moffett  
**Cc:** Woods, Clint  
**Subject:** FW: Meeting Request

Hi Hilary,

It looks like Clint Woods, Mandy Gunasekara and David Harlow could be available for a 45 minute meeting on Tuesday, January 30 at 10:00am.

Please advise if this could work on your end.

Thank you.  
Emily

Emily Atkinson  
Management Analyst/Office Manager  
Immediate Office of the Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5412B, 1200 Pennsylvania Avenue NW  
Washington, DC 20460  
Voice: 202-564-1850  
Email: [atkinson.emily@epa.gov](mailto:atkinson.emily@epa.gov)

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**From:** Hilary Moffett [<mailto:moffetth@api.org>]  
**Sent:** Wednesday, December 20, 2017 1:06 PM  
**To:** Woods, Clinton <[woods.clinton@epa.gov](mailto:woods.clinton@epa.gov)>  
**Subject:** RE: Meeting Request

Thanks Clint.

On Tuesday 1/30 we could do anything in the morning before about 1. Could also do 330-5.  
On Wednesday 1/31, we could do 1-4.  
Does anything in there work?

Thanks,  
Hilary

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**From:** Woods, Clinton [<mailto:woods.clinton@epa.gov>]  
**Sent:** Wednesday, December 20, 2017 10:50 AM  
**To:** Hilary Moffett  
**Subject:** RE: Meeting Request

Hilary,

Thanks so much, and it was great to meet you as well. That sounds great – Please let me know if there are some good dates/times the weeks of January 22 or 29 (for the latter, the early part of the week is better from my end) and we can get something set up.

Clint Woods  
Deputy Assistant Administrator  
Office of Air and Radiation, U.S. EPA  
202.564.6562

---

**From:** Hilary Moffett [<mailto:moffetth@api.org>]  
**Sent:** Wednesday, December 20, 2017 10:44 AM  
**To:** Woods, Clinton <[woods.clinton@epa.gov](mailto:woods.clinton@epa.gov)>  
**Subject:** Meeting Request

Hi Clint,

I hope this email finds you well –great to meet you yesterday!! I didn't want to bombard you on your first week with a meeting request, so I waited until week 2!! I hope you're settling in nicely.

API would like to bring in a few member companies to talk about Ozone Implementation Assistance. Do you have some time the last week in January?

Thanks,  
Hilary

Hilary Moffett  
Director, Federal Relations  
American Petroleum Institute  
202-682-8040 (desk)  
612-710-8696 (cell)  
[MoffettH@api.org](mailto:MoffettH@api.org)

Message

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**From:** Woods, Clint [Woods.Clint@epa.gov]  
**Sent:** 1/2/2018 5:35:24 PM  
**To:** Atkinson, Emily [Atkinson.Emily@epa.gov]  
**Subject:** FW: Meeting Request

Emily,

Apologies if I sent this previously – Any chance there might be a time available the morning of 1/30 that could work for Mandy, David, and myself? API is interested in discussing ozone implementation issues. 45 mins to an hour should work.

Thanks!

Clint Woods  
Deputy Assistant Administrator  
Office of Air and Radiation, U.S. EPA  
202.564.6562

---

**From:** Hilary Moffett [mailto:moffetth@api.org]  
**Sent:** Wednesday, December 20, 2017 1:06 PM  
**To:** Woods, Clinton <woods.clinton@epa.gov>  
**Subject:** RE: Meeting Request

Thanks Clint.

On Tuesday 1/30 we could do anything in the morning before about 1. Could also do 330-5.  
On Wednesday 1/31, we could do 1-4.  
Does anything in there work?

Thanks,  
Hilary

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**From:** Woods, Clinton [mailto:woods.clinton@epa.gov]  
**Sent:** Wednesday, December 20, 2017 10:50 AM  
**To:** Hilary Moffett  
**Subject:** RE: Meeting Request

Hilary,

Thanks so much, and it was great to meet you as well. That sounds great – Please let me know if there are some good dates/times the weeks of January 22 or 29 (for the latter, the early part of the week is better from my end) and we can get something set up.

Clint Woods  
Deputy Assistant Administrator  
Office of Air and Radiation, U.S. EPA  
202.564.6562

---

**From:** Hilary Moffett [mailto:moffetth@api.org]  
**Sent:** Wednesday, December 20, 2017 10:44 AM

**To:** Woods, Clinton <[woods.clinton@epa.gov](mailto:woods.clinton@epa.gov)>

**Subject:** Meeting Request

Hi Clint,

I hope this email finds you well –great to meet you yesterday!! I didn't want to bombard you on your first week with a meeting request, so I waited until week 2!! I hope you're settling in nicely.

API would like to bring in a few member companies to talk about Ozone Implementation Assistance. Do you have some time the last week in January?

Thanks,  
Hilary

Hilary Moffett  
Director, Federal Relations  
American Petroleum Institute  
202-682-8040 (desk)  
612-710-8696 (cell)  
[MoffettH@api.org](mailto:MoffettH@api.org)



## Message

**From:** Atkinson, Emily [Atkinson.Emily@epa.gov]  
**Sent:** 11/29/2017 4:35:05 PM  
**To:** Bhandaram, Sundara [Sundara\_Bhandaram@afandpa.org]  
**CC:** Tyler Norvell [tyler@glenncoffee.com]; Noe, Paul [Paul\_Noel@afandpa.org]; Loving, Shanita [Loving.Shanita@epa.gov]  
**Subject:** Confirmed 12/18 at 11am: Meeting Request from AF&PA, National Alliance of Forest Owners, International Paper and WestRock

Hi Sundara,

You are confirmed for a one hour in person meeting on Monday, December 18, 2017 at 11:00am with Bill Wehrum (see below for dial in information for the two people participating by phone).

Personal Phone / Ex. 6

Participant Code: Personal Phone / Ex. 6

Directions and procedures to 1200 Pennsylvania Avenue NW:

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**Taxi:** Direct the taxi to drop you off on 12th Street NW, between Constitution and Pennsylvania Avenues, at the elevator for the Federal Triangle metro stop - this is almost exactly half way between the two avenues on 12<sup>th</sup> Street NW. Facing the building with the EPA logo and American flags, walk toward the building and take the glass door on your right hand side with the escalators going down to the metro on your left – that is the North Lobby of the William Jefferson Clinton building.

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Please feel free to contact me should you need any additional information.

Emily

Emily Atkinson  
 Management Analyst/Office Manager  
 Immediate Office of the Assistant Administrator  
 Office of Air and Radiation, USEPA  
 Room 5412B, 1200 Pennsylvania Avenue NW  
 Washington, DC 20460  
 Voice: 202-564-1850  
 Email: atkinson.emily@epa.gov

---

**From:** Bhandaram, Sundara [mailto:Sundara\_Bhandaram@afandpa.org]  
**Sent:** Wednesday, November 29, 2017 9:55 AM  
**To:** Atkinson, Emily <Atkinson.Emily@epa.gov>  
**Cc:** Tyler Norvell <tyler@glenncoffee.com>; Noe, Paul <Paul\_Noel@afandpa.org>; Loving, Shanita

<Loving.Shanita@epa.gov>

**Subject:** RE: Meeting Request from AF&PA, National Alliance of Forest Owners, International Paper and WestRock

Hi Emily,

I'm happy to confirm that everyone is available. Below is the list of everyone who will be participating. The last two folks on the list anticipate joining the meeting by phone. Please let me know if you need anything else.

AF&PA:

1. Donna Harman, President and CEO [donna\\_harman@afandpa.org](mailto:donna_harman@afandpa.org) (Assistant: Brooke Haywood Hack [brooke\\_hack@afandpa.org](mailto:brooke_hack@afandpa.org))
2. Paul Noe, Vice President, Public Policy [paul\\_noe@afandpa.org](mailto:paul_noe@afandpa.org) (Assistant: Sundara Bhandaram [sundara\\_bhandaram@afandpa.org](mailto:sundara_bhandaram@afandpa.org))
3. Russ Frye, Outside Counsel [rfrye@fryelaw.com](mailto:rfrye@fryelaw.com)

NAFO:

1. David Tenny, President and CEO [dtenny@nafoalliance.org](mailto:dtenny@nafoalliance.org)
  2. Chip Murray, Vice President for Policy and General Counsel [cmurray@nafoalliance.org](mailto:cmurray@nafoalliance.org)
  3. Tyler Norvell, Outside Counsel [tyler@glenncoffee.com](mailto:tyler@glenncoffee.com)
- NAFO Administrative Coordinator: Emma Flanagan [eflanagan@nafoalliance.org](mailto:eflanagan@nafoalliance.org)

Domtar:

Annabeth Reitter, Corporate Manager, Environmental Regulation [annabeth.reitter@domtar.com](mailto:annabeth.reitter@domtar.com)

WestRock:

Louis Hengen, Director Government Relations [louis.hengen@westrock.com](mailto:louis.hengen@westrock.com)

International Paper:

Neil Naraine, Director, Government Relations [neil.naraine@ipaper.com](mailto:neil.naraine@ipaper.com)

Thank you,  
Sundara

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**From:** Bhandaram, Sundara

**Sent:** Tuesday, November 28, 2017 2:29 PM

**To:** 'Atkinson, Emily' <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>

**Cc:** Tyler Norvell <[tyler@glenncoffee.com](mailto:tyler@glenncoffee.com)>; Noe, Paul <[Paul.Noel@afandpa.org](mailto:Paul.Noel@afandpa.org)>; Loving, Shanita <[Loving.Shanita@epa.gov](mailto:Loving.Shanita@epa.gov)>

**Subject:** RE: Meeting Request from AF&PA, National Alliance of Forest Owners, International Paper and WestRock

Hi Emily,

Please hold this time. I will run it past our members to make sure there are no conflicts.

Best,  
Sundara

---

**From:** Atkinson, Emily [<mailto:Atkinson.Emily@epa.gov>]

**Sent:** Tuesday, November 28, 2017 2:03 PM

**To:** Bhandaram, Sundara <[Sundara\\_Bhandaram@afandpa.org](mailto:Sundara_Bhandaram@afandpa.org)>  
**Cc:** Tyler Norvell <[tyler@glenncoffee.com](mailto:tyler@glenncoffee.com)>; Noe, Paul <[Paul\\_Noe@afandpa.org](mailto:Paul_Noe@afandpa.org)>; Loving, Shanita <[Loving.Shanita@epa.gov](mailto:Loving.Shanita@epa.gov)>  
**Subject:** RE: Meeting Request from AF&PA, National Alliance of Forest Owners, International Paper and WestRock

Hi Sundara,

Yes, it looks like we could fit it in on Monday, December 18 at 11:00am.

Let me know if this works on your end.

Emily

Emily Atkinson  
Management Analyst/Office Manager  
Immediate Office of the Acting Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5412B, 1200 Pennsylvania Avenue NW  
Washington, DC 20460  
Voice: 202-564-1850  
Email: [atkinson.emily@epa.gov](mailto:atkinson.emily@epa.gov)

---

**From:** Bhandaram, Sundara [[mailto:Sundara\\_Bhandaram@afandpa.org](mailto:Sundara_Bhandaram@afandpa.org)]  
**Sent:** Tuesday, November 28, 2017 1:44 PM  
**To:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>  
**Cc:** Tyler Norvell <[tyler@glenncoffee.com](mailto:tyler@glenncoffee.com)>; Noe, Paul <[Paul\\_Noe@afandpa.org](mailto:Paul_Noe@afandpa.org)>; Loving, Shanita <[Loving.Shanita@epa.gov](mailto:Loving.Shanita@epa.gov)>  
**Subject:** RE: Meeting Request from AF&PA, National Alliance of Forest Owners, International Paper and WestRock

Hi Emily,

Unfortunately, our staff will be in North Carolina for meetings on December 13<sup>th</sup> and 14<sup>th</sup>. Would December 18<sup>th</sup> or the early part of December 19<sup>th</sup> work?

Best,  
Sundara

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**From:** Atkinson, Emily [<mailto:Atkinson.Emily@epa.gov>]  
**Sent:** Tuesday, November 28, 2017 1:42 PM  
**To:** Bhandaram, Sundara <[Sundara\\_Bhandaram@afandpa.org](mailto:Sundara_Bhandaram@afandpa.org)>  
**Cc:** Tyler Norvell <[tyler@glenncoffee.com](mailto:tyler@glenncoffee.com)>; Noe, Paul <[Paul\\_Noe@afandpa.org](mailto:Paul_Noe@afandpa.org)>; Loving, Shanita <[Loving.Shanita@epa.gov](mailto:Loving.Shanita@epa.gov)>  
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Emily

Emily Atkinson  
Management Analyst/Office Manager  
Immediate Office of the Acting Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5412B, 1200 Pennsylvania Avenue NW  
Washington, DC 20460  
Voice: 202-564-1850  
Email: [atkinson.emily@epa.gov](mailto:atkinson.emily@epa.gov)

---

**From:** Bhandaram, Sundara [[mailto:Sundara\\_Bhandaram@afandpa.org](mailto:Sundara_Bhandaram@afandpa.org)]  
**Sent:** Tuesday, November 28, 2017 1:30 PM  
**To:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>  
**Cc:** Tyler Norvell <[tyler@glenncoffee.com](mailto:tyler@glenncoffee.com)>; Noe, Paul <[Paul\\_Noe@afandpa.org](mailto:Paul_Noe@afandpa.org)>; Loving, Shanita <[Loving.Shanita@epa.gov](mailto:Loving.Shanita@epa.gov)>  
**Subject:** RE: Meeting Request from AF&PA, National Alliance of Forest Owners, International Paper and WestRock

Hi Emily,

The 5<sup>th</sup> organization will be Domtar. The purpose of the meeting is to discuss the regulatory status of biogenic CO<sub>2</sub> under the Clean Air Act and implementation of the legislation recently enacted by Congress in the "Consolidated Appropriations Act, 2017," Public Law 115-31, Section 428.

Thanks,  
Sundara

---

**From:** Atkinson, Emily [<mailto:Atkinson.Emily@epa.gov>]  
**Sent:** Tuesday, November 28, 2017 11:32 AM  
**To:** Bhandaram, Sundara <[Sundara\\_Bhandaram@afandpa.org](mailto:Sundara_Bhandaram@afandpa.org)>  
**Cc:** Tyler Norvell <[tyler@glenncoffee.com](mailto:tyler@glenncoffee.com)>; Noe, Paul <[Paul\\_Noe@afandpa.org](mailto:Paul_Noe@afandpa.org)>; Loving, Shanita <[Loving.Shanita@epa.gov](mailto:Loving.Shanita@epa.gov)>  
**Subject:** RE: Meeting Request from AF&PA, National Alliance of Forest Owners, International Paper and WestRock

Hi Sundara,

We are reviewing this request and will be in touch shortly with scheduling options to get this on the calendar for Bill Wehrum, David Harlow and Mandy Gunasekara.

In the meantime, please send a brief agenda so we can be sure we have the right staff included in this meeting.

Also, please confirm that a 5<sup>th</sup> organization would join you for this meeting. Right now it looks like it would be these four - AF&PA, the National Alliance of Forest Owners, International Paper and WestRock, however, there would need to be at least 5 organizations present for this meeting to take place.

I am also including Tyler Norvell on this email chain, as he had been in touch separately about setting up a meeting on this subject with Mandy Gunasekara and she requested that they be combine.

Thank you.  
Emily

Emily Atkinson  
Management Analyst/Office Manager

Immediate Office of the Acting Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5412B, 1200 Pennsylvania Avenue NW  
Washington, DC 20460  
Voice: 202-564-1850  
Email: [atkinson.emily@epa.gov](mailto:atkinson.emily@epa.gov)

---

**From:** Noe, Paul [[mailto:Paul\\_Noe@afandpa.org](mailto:Paul_Noe@afandpa.org)]  
**Sent:** Monday, November 27, 2017 12:47 PM  
**To:** Wehrum, Bill <[Wehrum.Bill@epa.gov](mailto:Wehrum.Bill@epa.gov)>  
**Cc:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>; Bhandaram, Sundara <[Sundara\\_Bhandaram@afandpa.org](mailto:Sundara_Bhandaram@afandpa.org)>  
**Subject:** RE: Meeting Request

Thank you Bill

Emily: I am copying Sundara who can help find a good time.

Best regards

Paul

---

**From:** Wehrum, Bill [<mailto:Wehrum.Bill@epa.gov>]  
**Sent:** Monday, November 27, 2017 12:34 PM  
**To:** Noe, Paul <[Paul\\_Noe@afandpa.org](mailto:Paul_Noe@afandpa.org)>  
**Cc:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>  
**Subject:** RE: Meeting Request

Hi Paul. Thanks for being flexible on the timing of this meeting. I've copied Emily Atkinson. She can work with you to find a suitable time.

---

**From:** Noe, Paul [[mailto:Paul\\_Noe@afandpa.org](mailto:Paul_Noe@afandpa.org)]  
**Sent:** Monday, November 27, 2017 12:13 PM  
**To:** Wehrum, Bill <[Wehrum.Bill@epa.gov](mailto:Wehrum.Bill@epa.gov)>  
**Subject:** Meeting Request

Hi Bill:

On behalf of AF&PA, the National Alliance of Forest Owners, International Paper and WestRock, I'd like to request a meeting with you to discuss the status of biogenic CO2 under the Clean Air Act. We would like to meet with you before the holidays in December – i.e., before cob December 19 if possible.

Thank you,

Paul

**Paul Noe**

Vice President for Public Policy

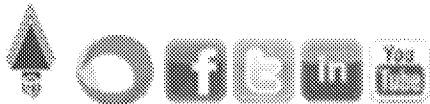
[Paul\\_Noel@afandpa.org](mailto:Paul_Noel@afandpa.org)

(202) 463-2777

AMERICAN FOREST & PAPER ASSOCIATION

1101 K Street, N.W., Suite 700

Washington, D.C. 20005



## Message

**From:** Loving, Shanita [Loving.Shanita@epa.gov]  
**Sent:** 11/29/2017 4:26:53 PM  
**To:** Hilary Moffett [moffetth@api.org]  
**Subject:** Confirmed: 12/13 at 2:00 pm ET: EPA - API

**Importance:** High

You are confirmed for a 30 minute meeting on Wednesday, December 13<sup>th</sup> 2:00 – 2:30 pm ET with Bill Wehrum.

Directions and procedures to 1200 Pennsylvania Avenue NW:

**Metro:** If you come by Metro get off at the Federal Triangle metro stop. Exit the metro station and go up two sets of escalators to the surface level and turn right. You will see a short staircase and wheelchair ramp leading to a set of glass doors with the EPA logo - that is the William Jefferson Clinton Federal Building, North Entrance.

**Taxi:** Direct the taxi to drop you off on 12th Street NW, between Constitution and Pennsylvania Avenues, at the elevator for the Federal Triangle metro stop - this is almost exactly half way between the two avenues on 12<sup>th</sup> Street NW. Facing the building with the EPA logo and American flags, walk toward the building and take the glass door on your right hand side with the escalators going down to the metro on your left – that is the North Lobby of the William Jefferson Clinton building.

**Security Procedures:** A government issued photo id is required to enter the building and it is suggested you arrive 15 minutes early in order to be cleared and arrive at the meeting room on time. Upon entering the lobby, the meeting attendees will be asked to pass through security and provide a photo ID for entrance. Let the guards know that you were instructed to call 202-564-7404 for a security escort.

Please send me a list of participants in advance of the meeting and feel free to contact me should you need any additional information.

Shanita Loving  
 Staff Assistant  
 Immediate Office of the Assistant Administrator  
 Office of Air and Radiation, USEPA  
 Room 5406 B, WJC-North  
 1200 Pennsylvania Avenue, NW  
 Washington, DC 20460  
 Phone: 202-564-4728

---

**From:** Hilary Moffett [mailto:moffetth@api.org]  
**Sent:** Tuesday, November 28, 2017 5:05 PM  
**To:** Loving, Shanita <Loving.Shanita@epa.gov>  
**Cc:** Atkinson, Emily <Atkinson.Emily@epa.gov>  
**Subject:** RE: Meeting Request for Bill Wehrum

Hi Shanita,

Thanks again for sending these times. We'll take Dec 13<sup>th</sup> from 2-230. I will send you an agenda and a list of attendees (and their company) next week. Will that provide enough lead time?

Regards,  
 Hilary

---

**From:** Loving, Shanita [<mailto:Loving.Shanita@epa.gov>]  
**Sent:** Tuesday, November 28, 2017 3:30 PM  
**To:** Hilary Moffett  
**Cc:** Atkinson, Emily  
**Subject:** FW: Meeting Request for Bill Wehrum  
**Importance:** High

Hi Hilary,

Please see a list of dates/times slots that Bill will be available for a 30 minute meeting. Let us know which date and time will work best on your end.

**December 13<sup>th</sup>**

2:00 – 3:00 pm

**December 14<sup>th</sup>**

1:00 – 2:00 pm

4:00 – 5:00 pm

Thanks!

Shanita Loving  
Staff Assistant  
Immediate Office of the Acting Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5406 B, WJC-North  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460  
Phone: 202-564-4728

---

**From:** Atkinson, Emily  
**Sent:** Monday, November 27, 2017 11:43 AM  
**To:** Hilary Moffett <[moffetth@api.org](mailto:moffetth@api.org)>  
**Cc:** Loving, Shanita <[Loving.Shanita@epa.gov](mailto:Loving.Shanita@epa.gov)>  
**Subject:** RE: Meeting Request for Bill Wehrum

Hi Hilary,

Thank you for the meeting request – we will review it and get back to you shortly.

Emily

Emily Atkinson  
Management Analyst/Office Manager  
Immediate Office of the Acting Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5412B, 1200 Pennsylvania Avenue NW  
Washington, DC 20460  
Voice: 202-564-1850  
Email: [atkinson.emily@epa.gov](mailto:atkinson.emily@epa.gov)



---

**From:** Hilary Moffett [<mailto:moffetth@api.org>]  
**Sent:** Monday, November 27, 2017 9:29 AM  
**To:** Loving, Shanita <[Loving.Shanita@epa.gov](mailto:Loving.Shanita@epa.gov)>  
**Cc:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>  
**Subject:** Meeting Request for Bill Wehrum

Good Morning Shanita,

I hope this email finds you well. A group of people from API and our member companies wanted to schedule a meeting with Assistant Administrator Wehrum to discuss priorities. We have been working closely with Mandy and the team both in DC and in North Carolina on a number of air issues, and believe a meeting to touch bases on those issues would be mutually beneficial as Mr. Wehrum continues to dig into his new role. I understand that he is incredibly busy, and only ask for about 30 minutes of his time in the coming weeks.

Thanks for your consideration.

Regards,  
Hilary

Hilary Moffett  
Director, Federal Relations  
American Petroleum Institute  
202-682-8040 (desk)  
612-710-8696 (cell)  
[MoffettH@api.org](mailto:MoffettH@api.org)

Message

---

**From:** Hilary Moffett [moffetth@api.org]  
**Sent:** 11/28/2017 10:05:28 PM  
**To:** Loving, Shanita [Loving.Shanita@epa.gov]  
**CC:** Atkinson, Emily [Atkinson.Emily@epa.gov]  
**Subject:** RE: Meeting Request for Bill Wehrum

Hi Shanita,

Thanks again for sending these times. We'll take Dec 13<sup>th</sup> from 2-230. I will send you an agenda and a list of attendees (and their company) next week. Will that provide enough lead time?

Regards,  
Hilary

---

**From:** Loving, Shanita [mailto:Loving.Shanita@epa.gov]  
**Sent:** Tuesday, November 28, 2017 3:30 PM  
**To:** Hilary Moffett  
**Cc:** Atkinson, Emily  
**Subject:** FW: Meeting Request for Bill Wehrum  
**Importance:** High

Hi Hilary,

Please see a list of dates/times slots that Bill will be available for a 30 minute meeting. Let us know which date and time will work best on your end.

**December 13<sup>th</sup>**  
2:00 – 3:00 pm

**December 14<sup>th</sup>**  
1:00 – 2:00 pm  
4:00 – 5:00 pm

Thanks!

Shanita Loving  
Staff Assistant  
Immediate Office of the Acting Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5406 B, WJC-North  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460  
Phone: 202-564-4728

---

**From:** Atkinson, Emily  
**Sent:** Monday, November 27, 2017 11:43 AM  
**To:** Hilary Moffett <moffetth@api.org>  
**Cc:** Loving, Shanita <Loving.Shanita@epa.gov>  
**Subject:** RE: Meeting Request for Bill Wehrum

Hi Hilary,

Thank you for the meeting request – we will review it and get back to you shortly.

Emily

Emily Atkinson  
Management Analyst/Office Manager  
Immediate Office of the Acting Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5412B, 1200 Pennsylvania Avenue NW  
Washington, DC 20460  
Voice: 202-564-1850  
Email: [atkinson.emily@epa.gov](mailto:atkinson.emily@epa.gov)

---

**From:** Hilary Moffett [<mailto:moffetth@api.org>]  
**Sent:** Monday, November 27, 2017 9:29 AM  
**To:** Loving, Shanita <[Loving.Shanita@epa.gov](mailto:Loving.Shanita@epa.gov)>  
**Cc:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>  
**Subject:** Meeting Request for Bill Wehrum

Good Morning Shanita,

I hope this email finds you well. A group of people from API and our member companies wanted to schedule a meeting with Assistant Administrator Wehrum to discuss priorities. We have been working closely with Mandy and the team both in DC and in North Carolina on a number of air issues, and believe a meeting to touch bases on those issues would be mutually beneficial as Mr. Wehrum continues to dig into his new role. I understand that he is incredibly busy, and only ask for about 30 minutes of his time in the coming weeks.

Thanks for your consideration.

Regards,  
Hilary

Hilary Moffett  
Director, Federal Relations  
American Petroleum Institute  
202-682-8040 (desk)  
612-710-8696 (cell)  
[MoffettH@api.org](mailto:MoffettH@api.org)

## Message

**From:** Hilary Moffett [moffetth@api.org]  
**Sent:** 11/28/2017 8:46:29 PM  
**To:** Loving, Shanita [Loving.Shanita@epa.gov]  
**CC:** Atkinson, Emily [Atkinson.Emily@epa.gov]  
**Subject:** RE: Meeting Request for Bill Wehrum

Thanks Shanita. I'm double checking on the times now and will get back to you ASAP.

I will send an agenda and the meeting attendees (and their organization) once we nail down a day and time. It won't be a problem to have 5 organizations present. I didn't know about the 5 group rule – is that for all Wehrum meetings? I apologize for my ignorance there.

Thanks,  
 Hilary

---

**From:** Loving, Shanita [mailto:Loving.Shanita@epa.gov]  
**Sent:** Tuesday, November 28, 2017 3:43 PM  
**To:** Hilary Moffett  
**Cc:** Atkinson, Emily  
**Subject:** FW: Meeting Request for Bill Wehrum  
**Importance:** High

Hi Hilary,

In addition to the dates and times that we proposed please send a brief agenda so we can be sure we have the right staff included in this meeting. Also, please confirm the names of the API member organizations who would join you for this meeting. As you may already know, there would need to be at least 5 organizations present for this meeting to take place.

If you have any questions please feel free to contact us. Thank you.

Shanita Loving  
 Staff Assistant  
 Immediate Office of the Assistant Administrator  
 Office of Air and Radiation, USEPA  
 Room 5406 B, WJC-North  
 1200 Pennsylvania Avenue, NW  
 Washington, DC 20460  
 Phone: 202-564-4728

---

**From:** Loving, Shanita  
**Sent:** Tuesday, November 28, 2017 3:31 PM  
**To:** 'moffetth@api.org' <moffetth@api.org>  
**Cc:** Atkinson, Emily <Atkinson.Emily@epa.gov>  
**Subject:** FW: Meeting Request for Bill Wehrum  
**Importance:** High

Hi Hilary,

Please see a list of dates/times slots that Bill will be available for a 30 minute meeting. Let us know which date and time will work best on your end.

**December 13<sup>th</sup>**

2:00 – 3:00 pm

**December 14<sup>th</sup>**

1:00 – 2:00 pm

4:00 – 5:00 pm

Thanks!

Shanita Loving  
Staff Assistant  
Immediate Office of the Acting Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5406 B, WJC-North  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460  
Phone: 202-564-4728

---

**From:** Atkinson, Emily  
**Sent:** Monday, November 27, 2017 11:43 AM  
**To:** Hilary Moffett <[moffetth@api.org](mailto:moffetth@api.org)>  
**Cc:** Loving, Shanita <[Loving.Shanita@epa.gov](mailto:Loving.Shanita@epa.gov)>  
**Subject:** RE: Meeting Request for Bill Wehrum

Hi Hilary,

Thank you for the meeting request – we will review it and get back to you shortly.

Emily

Emily Atkinson  
Management Analyst/Office Manager  
Immediate Office of the Acting Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5412B, 1200 Pennsylvania Avenue NW  
Washington, DC 20460  
Voice: 202-564-1850  
Email: [atkinson.emily@epa.gov](mailto:atkinson.emily@epa.gov)

---

**From:** Hilary Moffett [<mailto:moffetth@api.org>]  
**Sent:** Monday, November 27, 2017 9:29 AM  
**To:** Loving, Shanita <[Loving.Shanita@epa.gov](mailto:Loving.Shanita@epa.gov)>  
**Cc:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>  
**Subject:** Meeting Request for Bill Wehrum

Good Morning Shanita,

I hope this email finds you well. A group of people from API and our member companies wanted to schedule a meeting with Assistant Administrator Wehrum to discuss priorities. We have been working closely with Mandy and the team both in DC and in North Carolina on a number of air issues, and believe a meeting to touch bases on those issues would

be mutually beneficial as Mr. Wehrum continues to dig into his new role. I understand that he is incredibly busy, and only ask for about 30 minutes of his time in the coming weeks.

Thanks for your consideration.

Regards,  
Hilary

Hilary Moffett  
Director, Federal Relations  
American Petroleum Institute  
202-682-8040 (desk)  
612-710-8696 (cell)  
[MoffettH@api.org](mailto:MoffettH@api.org)

## Message

**From:** Tyler Norvell [tyler@glenncoffee.com]  
**Sent:** 12/12/2017 10:08:29 PM  
**To:** Noe, Paul [paul\_noe@afandpa.org]; Lewis, Josh [Lewis.Josh@epa.gov]; Bhandaram, Sundara [sundara\_bhandaram@afandpa.org]  
**CC:** Loving, Shanita [Loving.Shanita@epa.gov]; Atkinson, Emily [Atkinson.Emily@epa.gov]; cmurray@nafoalliance.org; Emma Flanagan [eflanagan@nafoalliance.org]  
**Subject:** Re: Confirmed 12/18 at 11am: Meeting Request from AF&PA, National Alliance of Forest Owners, International Paper and WestRock

Josh,

NAFO can meet with Bill after the holidays as well. Also, I have copied Chip Murray and Emma Flanagan with National Alliance of Forest Owners (NAFO) on this email for future correspondence as they are key participants in this effort.

Thanks!

Tyler

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---

**From:** Noe, Paul <paul\_noe@afandpa.org>  
**Sent:** Tuesday, December 12, 2017 2:57 PM  
**Subject:** RE: Confirmed 12/18 at 11am: Meeting Request from AF&PA, National Alliance of Forest Owners, International Paper and WestRock  
**To:** Lewis, Josh <lewis.josh@epa.gov>, Bhandaram, Sundara <sundara\_bhandaram@afandpa.org>  
**Cc:** Tyler Norvell <tyler@glenncoffee.com>, Loving, Shanita <loving.shanita@epa.gov>, Atkinson, Emily <atkinson.emily@epa.gov>

Josh: Thank you for your note. We can meet with Bill after the holidays. I will leave it to Sundara and Emily to work out a good time.

Best regards,

Paul

---

**From:** Lewis, Josh [mailto:Lewis.Josh@epa.gov]  
**Sent:** Tuesday, December 12, 2017 3:26 PM  
**To:** Bhandaram, Sundara <Sundara\_Bhandaram@afandpa.org>  
**Cc:** Tyler Norvell <tyler@glenncoffee.com>; Noe, Paul <Paul\_Noel@afandpa.org>; Loving, Shanita <Loving.Shanita@epa.gov>; Atkinson, Emily <Atkinson.Emily@epa.gov>  
**Subject:** FW: Confirmed 12/18 at 11am: Meeting Request from AF&PA, National Alliance of Forest Owners, International Paper and WestRock

Hi Sundara,

Bill Wehrum and his team are now on work travel on Monday 12/18 so we'll need to reschedule your 11 am meeting that day. I know your goal was to meet before the holidays. Realistically I'm not sure we'll be able to pull that off. If

there's something pressing that needs discussion, probably best if you or Paul give me a call and we can talk this through to see what's possible.

Josh Lewis  
Chief of Staff  
EPA/Office of Air and Radiation  
202 564 2095

---

**From:** Bhandaram, Sundara [[mailto:Sundara\\_Bhandaram@afandpa.org](mailto:Sundara_Bhandaram@afandpa.org)]  
**Sent:** Wednesday, November 29, 2017 9:55 AM  
**To:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>  
**Cc:** Tyler Norvell <[tyler@glenncoffee.com](mailto:tyler@glenncoffee.com)>; Noe, Paul <[Paul\\_No@afandpa.org](mailto:Paul_No@afandpa.org)>; Loving, Shanita <[Loving.Shanita@epa.gov](mailto:Loving.Shanita@epa.gov)>  
**Subject:** RE: Meeting Request from AF&PA, National Alliance of Forest Owners, International Paper and WestRock

Hi Emily,

I'm happy to confirm that everyone is available. Below is the list of everyone who will be participating. The last two folks on the list anticipate joining the meeting by phone. Please let me know if you need anything else.

AF&PA:

1. Donna Harman, President and CEO [donna\\_harman@afandpa.org](mailto:donna_harman@afandpa.org) (Assistant: Brooke Haywood Hack [brooke\\_hack@afandpa.org](mailto:brooke_hack@afandpa.org))
2. Paul Noe, Vice President, Public Policy [paul\\_noe@afandpa.org](mailto:paul_noe@afandpa.org) (Assistant: Sundara Bhandaram [sundara\\_bhandaram@afandpa.org](mailto:sundara_bhandaram@afandpa.org))
3. Russ Frye, Outside Counsel [rfrye@fryelaw.com](mailto:rfrye@fryelaw.com)

NAFO:

1. David Tenny, President and CEO [dtenny@nafoalliance.org](mailto:dtenny@nafoalliance.org)
  2. Chip Murray, Vice President for Policy and General Counsel [cmurray@nafoalliance.org](mailto:cmurray@nafoalliance.org)
  3. Tyler Norvell, Outside Counsel [tyler@glenncoffee.com](mailto:tyler@glenncoffee.com)
- NAFO Administrative Coordinator: Emma Flanagan [eflanagan@nafoalliance.org](mailto:eflanagan@nafoalliance.org)

Domtar:

Annabeth Reitter, Corporate Manager, Environmental Regulation [annabeth.reitter@domtar.com](mailto:annabeth.reitter@domtar.com)

WestRock:

Louis Hengen, Director Government Relations [louis.hengen@westrock.com](mailto:louis.hengen@westrock.com)

International Paper:

Neil Naraine, Director, Government Relations [neil.naraine@ipaper.com](mailto:neil.naraine@ipaper.com)

Thank you,  
Sundara

---

**From:** Bhandaram, Sundara  
**Sent:** Tuesday, November 28, 2017 2:29 PM  
**To:** 'Atkinson, Emily' <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>  
**Cc:** Tyler Norvell <[tyler@glenncoffee.com](mailto:tyler@glenncoffee.com)>; Noe, Paul <[Paul\\_No@afandpa.org](mailto:Paul_No@afandpa.org)>; Loving, Shanita



<Loving.Shanita@epa.gov>

**Subject:** RE: Meeting Request from AF&PA, National Alliance of Forest Owners, International Paper and WestRock

Hi Emily,

Please hold this time. I will run it past our members to make sure there are no conflicts.

Best,  
Sundara

---

**From:** Atkinson, Emily [<mailto:Atkinson.Emily@epa.gov>]

**Sent:** Tuesday, November 28, 2017 2:03 PM

**To:** Bhandaram, Sundara <[Sundara\\_Bhandaram@afandpa.org](mailto:Sundara_Bhandaram@afandpa.org)>

**Cc:** Tyler Norvell <[tyler@glenncoffee.com](mailto:tyler@glenncoffee.com)>; Noe, Paul <[Paul\\_Noe@afandpa.org](mailto:Paul_Noe@afandpa.org)>; Loving, Shanita <[Loving.Shanita@epa.gov](mailto:Loving.Shanita@epa.gov)>

**Subject:** RE: Meeting Request from AF&PA, National Alliance of Forest Owners, International Paper and WestRock

Hi Sundara,

Yes, it looks like we could fit it in on Monday, December 18 at 11:00am.

Let me know if this works on your end.

Emily

Emily Atkinson  
Management Analyst/Office Manager  
Immediate Office of the Acting Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5412B, 1200 Pennsylvania Avenue NW  
Washington, DC 20460  
Voice: 202-564-1850  
Email: [atkinson.emily@epa.gov](mailto:atkinson.emily@epa.gov)

---

**From:** Bhandaram, Sundara [[mailto:Sundara\\_Bhandaram@afandpa.org](mailto:Sundara_Bhandaram@afandpa.org)]

**Sent:** Tuesday, November 28, 2017 1:44 PM

**To:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>

**Cc:** Tyler Norvell <[tyler@glenncoffee.com](mailto:tyler@glenncoffee.com)>; Noe, Paul <[Paul\\_Noe@afandpa.org](mailto:Paul_Noe@afandpa.org)>; Loving, Shanita <[Loving.Shanita@epa.gov](mailto:Loving.Shanita@epa.gov)>

**Subject:** RE: Meeting Request from AF&PA, National Alliance of Forest Owners, International Paper and WestRock

Hi Emily,

Unfortunately, our staff will be in North Carolina for meetings on December 13<sup>th</sup> and 14<sup>th</sup>. Would December 18<sup>th</sup> or the early part of December 19<sup>th</sup> work?

Best,  
Sundara

---

**From:** Atkinson, Emily [<mailto:Atkinson.Emily@epa.gov>]

**Sent:** Tuesday, November 28, 2017 1:42 PM

**To:** Bhandaram, Sundara <[Sundara\\_Bhandaram@afandpa.org](mailto:Sundara_Bhandaram@afandpa.org)>

**Cc:** Tyler Norvell <[tyler@glenncoffee.com](mailto:tyler@glenncoffee.com)>; Noe, Paul <[Paul\\_Noe@afandpa.org](mailto:Paul_Noe@afandpa.org)>; Loving, Shanita <[Loving.Shanita@epa.gov](mailto:Loving.Shanita@epa.gov)>

**Subject:** RE: Meeting Request from AF&PA, National Alliance of Forest Owners, International Paper and WestRock

Hi Sundara,

It looks like Bill Wehrum could be available for a one hour meeting on Wednesday, December 13 at 11:00am.

Please advise if this could work on your end.

Emily

Emily Atkinson

Management Analyst/Office Manager

Immediate Office of the Acting Assistant Administrator

Office of Air and Radiation, USEPA

Room 5412B, 1200 Pennsylvania Avenue NW

Washington, DC 20460

Voice: 202-564-1850

Email: [atkinson.emily@epa.gov](mailto:atkinson.emily@epa.gov)

---

**From:** Bhandaram, Sundara [[mailto:Sundara\\_Bhandaram@afandpa.org](mailto:Sundara_Bhandaram@afandpa.org)]

**Sent:** Tuesday, November 28, 2017 1:30 PM

**To:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>

**Cc:** Tyler Norvell <[tyler@glenncoffee.com](mailto:tyler@glenncoffee.com)>; Noe, Paul <[Paul\\_Noe@afandpa.org](mailto:Paul_Noe@afandpa.org)>; Loving, Shanita <[Loving.Shanita@epa.gov](mailto:Loving.Shanita@epa.gov)>

**Subject:** RE: Meeting Request from AF&PA, National Alliance of Forest Owners, International Paper and WestRock

Hi Emily,

The 5<sup>th</sup> organization will be Domtar. The purpose of the meeting is to discuss the regulatory status of biogenic CO<sub>2</sub> under the Clean Air Act and implementation of the legislation recently enacted by Congress in the "Consolidated Appropriations Act, 2017," Public Law 115-31, Section 428.

Thanks,  
Sundara

---

**From:** Atkinson, Emily [<mailto:Atkinson.Emily@epa.gov>]

**Sent:** Tuesday, November 28, 2017 11:32 AM

**To:** Bhandaram, Sundara <[Sundara\\_Bhandaram@afandpa.org](mailto:Sundara_Bhandaram@afandpa.org)>

**Cc:** Tyler Norvell <[tyler@glenncoffee.com](mailto:tyler@glenncoffee.com)>; Noe, Paul <[Paul\\_Noe@afandpa.org](mailto:Paul_Noe@afandpa.org)>; Loving, Shanita <[Loving.Shanita@epa.gov](mailto:Loving.Shanita@epa.gov)>

**Subject:** RE: Meeting Request from AF&PA, National Alliance of Forest Owners, International Paper and WestRock

Hi Sundara,

We are reviewing this request and will be in touch shortly with scheduling options to get this on the calendar for Bill Wehrum, David Harlow and Mandy Gunasekara.

In the meantime, please send a brief agenda so we can be sure we have the right staff included in this meeting.

Also, please confirm that a 5<sup>th</sup> organization would join you for this meeting. Right now it looks like it would be these four - AF&PA, the National Alliance of Forest Owners, International Paper and WestRock, however, there would need to be at least 5 organizations present for this meeting to take place.

I am also including Tyler Norvell on this email chain, as he had been in touch separately about setting up a meeting on this subject with Mandy Gunasekara and she requested that they be combine.

Thank you.  
Emily

Emily Atkinson  
Management Analyst/Office Manager  
Immediate Office of the Acting Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5412B, 1200 Pennsylvania Avenue NW  
Washington, DC 20460  
Voice: 202-564-1850  
Email: [atkinson.emily@epa.gov](mailto:atkinson.emily@epa.gov)

---

**From:** Noe, Paul [[mailto:Paul\\_Noe@afandpa.org](mailto:Paul_Noe@afandpa.org)]  
**Sent:** Monday, November 27, 2017 12:47 PM  
**To:** Wehrum, Bill <[Wehrum.Bill@epa.gov](mailto:Wehrum.Bill@epa.gov)>  
**Cc:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>; Bhandaram, Sundara <[Sundara\\_Bhandaram@afandpa.org](mailto:Sundara_Bhandaram@afandpa.org)>  
**Subject:** RE: Meeting Request

Thank you Bill

Emily: I am copying Sundara who can help find a good time.

Best regards

Paul

---

**From:** Wehrum, Bill [<mailto:Wehrum.Bill@epa.gov>]  
**Sent:** Monday, November 27, 2017 12:34 PM  
**To:** Noe, Paul <[Paul\\_Noe@afandpa.org](mailto:Paul_Noe@afandpa.org)>  
**Cc:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>  
**Subject:** RE: Meeting Request

Hi Paul. Thanks for being flexible on the timing of this meeting. I've copied Emily Atkinson. She can work with you to find a suitable time.

---

**From:** Noe, Paul [[mailto:Paul\\_Noe@afandpa.org](mailto:Paul_Noe@afandpa.org)]  
**Sent:** Monday, November 27, 2017 12:13 PM  
**To:** Wehrum, Bill <[Wehrum.Bill@epa.gov](mailto:Wehrum.Bill@epa.gov)>  
**Subject:** Meeting Request

Hi Bill:

On behalf of AF&PA, the National Alliance of Forest Owners, International Paper and WestRock, I'd like to request a meeting with you to discuss the status of biogenic CO2 under the Clean Air Act. We would like to meet with you before the holidays in December – i.e., before cob December 19 if possible.

Thank you,

Paul

**Paul Noe**

Vice President for Public Policy

[Paul\\_Noe@afandpa.org](mailto:Paul_Noe@afandpa.org)

(202) 463-2777

AMERICAN FOREST & PAPER ASSOCIATION

1101 K Street, N.W., Suite 700

Washington, D.C. 20005



## Message

**From:** Tyler Norvell [tyler@glenncoffee.com]  
**Sent:** 12/12/2017 10:08:29 PM  
**To:** Noe, Paul [paul\_noe@afandpa.org]; Lewis, Josh [Lewis.Josh@epa.gov]; Bhandaram, Sundara [sundara\_bhandaram@afandpa.org]  
**CC:** Loving, Shanita [Loving.Shanita@epa.gov]; Atkinson, Emily [Atkinson.Emily@epa.gov]; cmurray@nafoalliance.org; Emma Flanagan [eflanagan@nafoalliance.org]  
**Subject:** Re: Confirmed 12/18 at 11am: Meeting Request from AF&PA, National Alliance of Forest Owners, International Paper and WestRock

Josh,

NAFO can meet with Bill after the holidays as well. Also, I have copied Chip Murray and Emma Flanagan with National Alliance of Forest Owners (NAFO) on this email for future correspondence as they are key participants in this effort.

Thanks!

Tyler

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---

**From:** Noe, Paul <paul\_noe@afandpa.org>  
**Sent:** Tuesday, December 12, 2017 2:57 PM  
**Subject:** RE: Confirmed 12/18 at 11am: Meeting Request from AF&PA, National Alliance of Forest Owners, International Paper and WestRock  
**To:** Lewis, Josh <lewis.josh@epa.gov>, Bhandaram, Sundara <sundara\_bhandaram@afandpa.org>  
**Cc:** Tyler Norvell <tyler@glenncoffee.com>, Loving, Shanita <loving.shanita@epa.gov>, Atkinson, Emily <atkinson.emily@epa.gov>

Josh: Thank you for your note. We can meet with Bill after the holidays. I will leave it to Sundara and Emily to work out a good time.

Best regards,

Paul

---

**From:** Lewis, Josh [mailto:Lewis.Josh@epa.gov]  
**Sent:** Tuesday, December 12, 2017 3:26 PM  
**To:** Bhandaram, Sundara <Sundara\_Bhandaram@afandpa.org>  
**Cc:** Tyler Norvell <tyler@glenncoffee.com>; Noe, Paul <Paul\_Noel@afandpa.org>; Loving, Shanita <Loving.Shanita@epa.gov>; Atkinson, Emily <Atkinson.Emily@epa.gov>  
**Subject:** FW: Confirmed 12/18 at 11am: Meeting Request from AF&PA, National Alliance of Forest Owners, International Paper and WestRock

Hi Sundara,

Bill Wehrum and his team are now on work travel on Monday 12/18 so we'll need to reschedule your 11 am meeting that day. I know your goal was to meet before the holidays. Realistically I'm not sure we'll be able to pull that off. If

there's something pressing that needs discussion, probably best if you or Paul give me a call and we can talk this through to see what's possible.

Josh Lewis  
Chief of Staff  
EPA/Office of Air and Radiation  
202 564 2095

---

**From:** Bhandaram, Sundara [[mailto:Sundara\\_Bhandaram@afandpa.org](mailto:Sundara_Bhandaram@afandpa.org)]  
**Sent:** Wednesday, November 29, 2017 9:55 AM  
**To:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>  
**Cc:** Tyler Norvell <[tyler@glenncoffee.com](mailto:tyler@glenncoffee.com)>; Noe, Paul <[Paul\\_No@afandpa.org](mailto:Paul_No@afandpa.org)>; Loving, Shanita <[Loving.Shanita@epa.gov](mailto:Loving.Shanita@epa.gov)>  
**Subject:** RE: Meeting Request from AF&PA, National Alliance of Forest Owners, International Paper and WestRock

Hi Emily,

I'm happy to confirm that everyone is available. Below is the list of everyone who will be participating. The last two folks on the list anticipate joining the meeting by phone. Please let me know if you need anything else.

AF&PA:

1. Donna Harman, President and CEO [donna\\_harman@afandpa.org](mailto:donna_harman@afandpa.org) (Assistant: Brooke Haywood Hack [brooke\\_hack@afandpa.org](mailto:brooke_hack@afandpa.org))
2. Paul Noe, Vice President, Public Policy [paul\\_noe@afandpa.org](mailto:paul_noe@afandpa.org) (Assistant: Sundara Bhandaram [sundara\\_bhandaram@afandpa.org](mailto:sundara_bhandaram@afandpa.org))
3. Russ Frye, Outside Counsel [rfrye@fryelaw.com](mailto:rfrye@fryelaw.com)

NAFO:

1. David Tenny, President and CEO [dtenny@nafoalliance.org](mailto:dtenny@nafoalliance.org)
  2. Chip Murray, Vice President for Policy and General Counsel [cmurray@nafoalliance.org](mailto:cmurray@nafoalliance.org)
  3. Tyler Norvell, Outside Counsel [tyler@glenncoffee.com](mailto:tyler@glenncoffee.com)
- NAFO Administrative Coordinator: Emma Flanagan [eflanagan@nafoalliance.org](mailto:eflanagan@nafoalliance.org)

Domtar:

Annabeth Reitter, Corporate Manager, Environmental Regulation [annabeth.reitter@domtar.com](mailto:annabeth.reitter@domtar.com)

WestRock:

Louis Hengen, Director Government Relations [louis.hengen@westrock.com](mailto:louis.hengen@westrock.com)

International Paper:

Neil Naraine, Director, Government Relations [neil.naraine@ipaper.com](mailto:neil.naraine@ipaper.com)

Thank you,  
Sundara

---

**From:** Bhandaram, Sundara  
**Sent:** Tuesday, November 28, 2017 2:29 PM  
**To:** 'Atkinson, Emily' <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>  
**Cc:** Tyler Norvell <[tyler@glenncoffee.com](mailto:tyler@glenncoffee.com)>; Noe, Paul <[Paul\\_No@afandpa.org](mailto:Paul_No@afandpa.org)>; Loving, Shanita

<Loving.Shanita@epa.gov>

**Subject:** RE: Meeting Request from AF&PA, National Alliance of Forest Owners, International Paper and WestRock

Hi Emily,

Please hold this time. I will run it past our members to make sure there are no conflicts.

Best,  
Sundara

---

**From:** Atkinson, Emily [<mailto:Atkinson.Emily@epa.gov>]

**Sent:** Tuesday, November 28, 2017 2:03 PM

**To:** Bhandaram, Sundara <[Sundara\\_Bhandaram@afandpa.org](mailto:Sundara_Bhandaram@afandpa.org)>

**Cc:** Tyler Norvell <[tyler@glenncoffee.com](mailto:tyler@glenncoffee.com)>; Noe, Paul <[Paul\\_Noe@afandpa.org](mailto:Paul_Noe@afandpa.org)>; Loving, Shanita <[Loving.Shanita@epa.gov](mailto:Loving.Shanita@epa.gov)>

**Subject:** RE: Meeting Request from AF&PA, National Alliance of Forest Owners, International Paper and WestRock

Hi Sundara,

Yes, it looks like we could fit it in on Monday, December 18 at 11:00am.

Let me know if this works on your end.

Emily

Emily Atkinson  
Management Analyst/Office Manager  
Immediate Office of the Acting Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5412B, 1200 Pennsylvania Avenue NW  
Washington, DC 20460  
Voice: 202-564-1850  
Email: [atkinson.emily@epa.gov](mailto:atkinson.emily@epa.gov)

---

**From:** Bhandaram, Sundara [[mailto:Sundara\\_Bhandaram@afandpa.org](mailto:Sundara_Bhandaram@afandpa.org)]

**Sent:** Tuesday, November 28, 2017 1:44 PM

**To:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>

**Cc:** Tyler Norvell <[tyler@glenncoffee.com](mailto:tyler@glenncoffee.com)>; Noe, Paul <[Paul\\_Noe@afandpa.org](mailto:Paul_Noe@afandpa.org)>; Loving, Shanita <[Loving.Shanita@epa.gov](mailto:Loving.Shanita@epa.gov)>

**Subject:** RE: Meeting Request from AF&PA, National Alliance of Forest Owners, International Paper and WestRock

Hi Emily,

Unfortunately, our staff will be in North Carolina for meetings on December 13<sup>th</sup> and 14<sup>th</sup>. Would December 18<sup>th</sup> or the early part of December 19<sup>th</sup> work?

Best,  
Sundara

---

**From:** Atkinson, Emily [<mailto:Atkinson.Emily@epa.gov>]

**Sent:** Tuesday, November 28, 2017 1:42 PM

**To:** Bhandaram, Sundara <[Sundara\\_Bhandaram@afandpa.org](mailto:Sundara_Bhandaram@afandpa.org)>

**Cc:** Tyler Norvell <[tyler@glenncoffee.com](mailto:tyler@glenncoffee.com)>; Noe, Paul <[Paul\\_Noe@afandpa.org](mailto:Paul_Noe@afandpa.org)>; Loving, Shanita <[Loving.Shanita@epa.gov](mailto:Loving.Shanita@epa.gov)>

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Thanks,  
Sundara

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**Sent:** Tuesday, November 28, 2017 11:32 AM

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**Cc:** Tyler Norvell <[tyler@glenncoffee.com](mailto:tyler@glenncoffee.com)>; Noe, Paul <[Paul\\_Noe@afandpa.org](mailto:Paul_Noe@afandpa.org)>; Loving, Shanita <[Loving.Shanita@epa.gov](mailto:Loving.Shanita@epa.gov)>

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Washington, DC 20460  
Voice: 202-564-1850  
Email: [atkinson.emily@epa.gov](mailto:atkinson.emily@epa.gov)

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**Cc:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>; Bhandaram, Sundara <[Sundara\\_Bhandaram@afandpa.org](mailto:Sundara_Bhandaram@afandpa.org)>  
**Subject:** RE: Meeting Request

Thank you Bill

Emily: I am copying Sundara who can help find a good time.

Best regards

Paul

---

**From:** Wehrum, Bill [<mailto:Wehrum.Bill@epa.gov>]  
**Sent:** Monday, November 27, 2017 12:34 PM  
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**Cc:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>  
**Subject:** RE: Meeting Request

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Thank you,

Paul

**Paul Noe**

Vice President for Public Policy

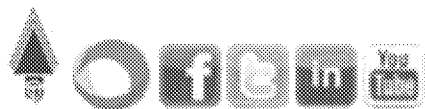
[Paul\\_Noe@afandpa.org](mailto:Paul_Noe@afandpa.org)

(202) 463-2777

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Washington, D.C. 20005



Message

---

**From:** Hilary Moffett [moffetth@api.org]  
**Sent:** 7/18/2017 1:22:56 PM  
**To:** Atkinson, Emily [Atkinson.Emily@epa.gov]  
**CC:** Dominguez, Alexander [dominguez.alexander@epa.gov]; Loving, Shanita [Loving.Shanita@epa.gov]  
**Subject:** Re: Methane Meeting request

Thank you so much! See you shortly

On Jul 18, 2017, at 9:13 AM, Atkinson, Emily <Atkinson.Emily@epa.gov> wrote:

Good Morning Hilary,

Yes, we are in WJC-North. The guard desk has your names and instructions to call our office at 202-564-7404.

Emily Atkinson  
Management Analyst/Office Manager  
Immediate Office of the Acting Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5412B, 1200 Pennsylvania Avenue NW  
Washington, DC 20460  
Voice: 202-564-1850  
Email: [atkinson.emily@epa.gov](mailto:atkinson.emily@epa.gov)

---

**From:** Hilary Moffett [<mailto:moffetth@api.org>]  
**Sent:** Tuesday, July 18, 2017 9:12 AM  
**To:** Atkinson, Emily <Atkinson.Emily@epa.gov>  
**Cc:** Dominguez, Alexander <[dominguez.alexander@epa.gov](mailto:dominguez.alexander@epa.gov)>; Loving, Shanita <[Loving.Shanita@epa.gov](mailto:Loving.Shanita@epa.gov)>  
**Subject:** Re: Methane Meeting request

Hi Emily,

Are we in WJC north? Just wanted to make sure before I send the group there. Is there a phone number contact for when we arrive?

Thanks,  
Hilary

On Jul 12, 2017, at 3:28 PM, Hilary Moffett <[moffetth@api.org](mailto:moffetth@api.org)> wrote:

Hi Emily,

I hope this email finds you well. For the meeting on July 18, the following people will be in attendance:

Hilary Moffett (API)  
Matthew Todd (API)  
Puneet Verma (Chevron)  
Angela Zivkovich (Anadarko)

Khary Cauthen (API)

Thanks,  
Hilary

---

**From:** Atkinson, Emily [<mailto:Atkinson.Emily@epa.gov>]  
**Sent:** Thursday, July 06, 2017 9:48 AM  
**To:** Hilary Moffett  
**Cc:** Dominguez, Alexander; Loving, Shanita  
**Subject:** RE: Methane Meeting request

Hi Hillary,

Just want to circle back on the API attendees. Could you send me a list of who will attend no later than noon on Monday, July 17 so I can get them to our security desk?

Thank you!  
Emily

Emily Atkinson  
Management Analyst/Office Manager  
Immediate Office of the Acting Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5412B, 1200 Pennsylvania Avenue NW  
Washington, DC 20460  
Voice: 202-564-1850  
Email: [atkinson.emily@epa.gov](mailto:atkinson.emily@epa.gov)

---

**From:** Hilary Moffett [<mailto:moffetth@api.org>]  
**Sent:** Thursday, July 06, 2017 8:36 AM  
**To:** Dominguez, Alexander <[dominguez.alexander@epa.gov](mailto:dominguez.alexander@epa.gov)>  
**Cc:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>  
**Subject:** Re: Methane Meeting request

Ahhh yes- sure can. Thanks so much!

On Jul 6, 2017, at 8:17 AM, Dominguez, Alexander <[dominguez.alexander@epa.gov](mailto:dominguez.alexander@epa.gov)> wrote:

All - Apologies for the back and forth. Good news – Mandy's travel was canceled so please confirm if you can still do the original Tuesday, July 18<sup>th</sup> at 10:00AM.

Alex

---

**From:** Dominguez, Alexander  
**Sent:** Friday, June 30, 2017 1:53 PM  
**To:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>  
**Cc:** Hilary Moffett <[moffetth@api.org](mailto:moffetth@api.org)>  
**Subject:** RE: Methane Meeting request

Emily and Hilary - I apologize but Mandy is now going to be on work-related travel the week of the 16<sup>th</sup> so we are going to have to reschedule for a more appropriate time. If we can coordinate a better time for everyone that would be great.

Hilary – Mandy is open the week of the 23<sup>rd</sup> but I was not sure when you all were traveling down to RTP so please let me know if there is a deadline for this meeting.

Alex

**Alex Dominguez**

*Policy Analyst to the Senior Advisors to  
the Administrator for Air and Water*  
U.S. Environmental Protection Agency  
Work: 202-564-3164 | Cell: 202-578-5985

---

**From:** Atkinson, Emily  
**Sent:** Thursday, June 29, 2017 8:56 AM  
**To:** Dominguez, Alexander <[dominguez.alexander@epa.gov](mailto:dominguez.alexander@epa.gov)>  
**Cc:** Hilary Moffett <[moffetth@api.org](mailto:moffetth@api.org)>; Gunasekara, Mandy <[Gunasekara.Mandy@epa.gov](mailto:Gunasekara.Mandy@epa.gov)>; Lewis, Josh <[Lewis.Josh@epa.gov](mailto:Lewis.Josh@epa.gov)>  
**Subject:** RE: Methane Meeting request

Hi Alex and Hilary,

OAR is happy to host this on the 5<sup>th</sup> floor and to send the meeting invite. Our list of participants is outlined below.

The best window for us is the morning of Tuesday, July 18 between 9am – 12pm. Please let me know how long you are looking to schedule this for and if there is a specific time in this window that works best for you, as well as if anyone else besides Mandy from your office needs an invite.

**OAR, OAQPS and OGC:** Sarah Dunham, Josh Lewis, Reid Harvey, Steve Page, Mike Koerber, Peter Tsirigotis, Dave Cozzie, Elliott Zenick

Thanks.  
Emily

Emily Atkinson  
Management Analyst/Office Manager  
Immediate Office of the Acting Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5412B, 1200 Pennsylvania Avenue NW  
Washington, DC 20460  
Voice: 202-564-1850  
Email: [atkinson.emily@epa.gov](mailto:atkinson.emily@epa.gov)

---

**From:** Lewis, Josh  
**Sent:** Thursday, June 29, 2017 7:58 AM  
**To:** Dominguez, Alexander <[dominguez.alexander@epa.gov](mailto:dominguez.alexander@epa.gov)>  
**Cc:** Hilary Moffett <[moffetth@api.org](mailto:moffetth@api.org)>; Gunasekara, Mandy <[Gunasekara.Mandy@epa.gov](mailto:Gunasekara.Mandy@epa.gov)>; Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>  
**Subject:** RE: Methane Meeting request

Yes we can do this. Adding Emily who can respond to this group with a suggested time, etc.

Josh Lewis  
Chief of Staff  
EPA/Office of Air and Radiation  
Office: 202 564 2095  
Cell: 202 329 2291

---

**From:** Dominguez, Alexander  
**Sent:** Wednesday, June 28, 2017 3:44 PM  
**To:** Lewis, Josh <[Lewis.Josh@epa.gov](mailto:Lewis.Josh@epa.gov)>  
**Cc:** Hilary Moffett <[moffetth@api.org](mailto:moffetth@api.org)>; Gunasekara, Mandy <[Gunasekara.Mandy@epa.gov](mailto:Gunasekara.Mandy@epa.gov)>  
**Subject:** FW: Methane Meeting request

Hey Josh,

Mandy requested I loop you in on this in hopes of setting up a videoconference with RTP in OARs conference room and having you and Sarah Dunham sit in as well. She is pretty open right now on July 18/19 and just let me know what you need on my end to help facilitate this. Appreciate it.

Alex

**Alex Dominguez**  
*Policy Analyst to the Senior Advisors to  
the Administrator for Air and Water*  
U.S. Environmental Protection Agency  
Work: 202-564-3164 | Cell: 202-578-5985

---

**From:** Hilary Moffett [<mailto:moffetth@api.org>]  
**Sent:** Tuesday, June 27, 2017 3:48 PM  
**To:** Dominguez, Alexander <[dominguez.alexander@epa.gov](mailto:dominguez.alexander@epa.gov)>  
**Subject:** Methane Meeting request

Hi Alex,

I hope this email finds you well. API was working with Mandy on the NSPS methane issue, and we would like to come in for a meeting with API, Mandy, and Peter (and others at RTP). We thought it would be helpful before we go down to RTP to discuss ways in which we believe the rule can be improved. Our team has spent a lot of time working

through the details, and we would like to share those with you all and with RTP, via phone or videoconference.

Do you and Mandy have availability on July 18/19?

Thanks,  
Hilary

## Message

**From:** Loving, Shanita [Loving.Shanita@epa.gov]  
**Sent:** 11/29/2017 4:26:53 PM  
**To:** 'Hilary Moffett' [moffetth@api.org]  
**Subject:** Confirmed: 12/13 at 2:00 pm ET: EPA - API

**Importance:** High

You are confirmed for a 30 minute meeting on Wednesday, December 13<sup>th</sup> 2:00 - 2:30 pm ET with Bill Wehrum.

Directions and procedures to 1200 Pennsylvania Avenue NW:

**Metro:** If you come by Metro get off at the Federal Triangle metro stop. Exit the metro station and go up two sets of escalators to the surface level and turn right. You will see a short staircase and wheelchair ramp leading to a set of glass doors with the EPA logo - that is the William Jefferson Clinton Federal Building, North Entrance.

**Taxi:** Direct the taxi to drop you off on 12th Street NW, between Constitution and Pennsylvania Avenues, at the elevator for the Federal Triangle metro stop - this is almost exactly half way between the two avenues on 12<sup>th</sup> Street NW. Facing the building with the EPA logo and American flags, walk toward the building and take the glass door on your right hand side with the escalators going down to the metro on your left - that is the North Lobby of the William Jefferson Clinton building.

**Security Procedures:** A government issued photo id is required to enter the building and it is suggested you arrive 15 minutes early in order to be cleared and arrive at the meeting room on time. Upon entering the lobby, the meeting attendees will be asked to pass through security and provide a photo ID for entrance. Let the guards know that you were instructed to call 202-564-7404 for a security escort.

Please send me a list of participants in advance of the meeting and feel free to contact me should you need any additional information.

Shanita Loving  
 Staff Assistant  
 Immediate Office of the Assistant Administrator  
 Office of Air and Radiation, USEPA  
 Room 5406 B, WJC-North  
 1200 Pennsylvania Avenue, NW  
 Washington, DC 20460  
 Phone: 202-564-4728

---

**From:** Hilary Moffett [mailto:moffetth@api.org]  
**Sent:** Tuesday, November 28, 2017 5:05 PM  
**To:** Loving, Shanita <Loving.Shanita@epa.gov>  
**Cc:** Atkinson, Emily <Atkinson.Emily@epa.gov>  
**Subject:** RE: Meeting Request for Bill Wehrum

Hi Shanita,

Thanks again for sending these times. We'll take Dec 13<sup>th</sup> from 2-230. I will send you an agenda and a list of attendees (and their company) next week. Will that provide enough lead time?

Regards,  
 Hilary



---

**From:** Loving, Shanita [<mailto:Loving.Shanita@epa.gov>]  
**Sent:** Tuesday, November 28, 2017 3:30 PM  
**To:** Hilary Moffett  
**Cc:** Atkinson, Emily  
**Subject:** FW: Meeting Request for Bill Wehrum  
**Importance:** High

Hi Hilary,

Please see a list of dates/times slots that Bill will be available for a 30 minute meeting. Let us know which date and time will work best on your end.

**December 13<sup>th</sup>**

2:00 - 3:00 pm

**December 14<sup>th</sup>**

1:00 - 2:00 pm

4:00 - 5:00 pm

Thanks!

Shanita Loving  
Staff Assistant  
Immediate Office of the Acting Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5406 B, WJC-North  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460  
Phone: 202-564-4728

---

**From:** Atkinson, Emily  
**Sent:** Monday, November 27, 2017 11:43 AM  
**To:** Hilary Moffett <[moffetth@api.org](mailto:moffetth@api.org)>  
**Cc:** Loving, Shanita <[Loving.Shanita@epa.gov](mailto:Loving.Shanita@epa.gov)>  
**Subject:** RE: Meeting Request for Bill Wehrum

Hi Hilary,

Thank you for the meeting request - we will review it and get back to you shortly.

Emily

Emily Atkinson  
Management Analyst/Office Manager  
Immediate Office of the Acting Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5412B, 1200 Pennsylvania Avenue NW  
Washington, DC 20460  
Voice: 202-564-1850  
Email: [atkinson.emily@epa.gov](mailto:atkinson.emily@epa.gov)

---

**From:** Hilary Moffett [<mailto:moffetth@api.org>]  
**Sent:** Monday, November 27, 2017 9:29 AM  
**To:** Loving, Shanita <[Loving.Shanita@epa.gov](mailto:Loving.Shanita@epa.gov)>  
**Cc:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>  
**Subject:** Meeting Request for Bill Wehrum

Good Morning Shanita,

I hope this email finds you well. A group of people from API and our member companies wanted to schedule a meeting with Assistant Administrator Wehrum to discuss priorities. We have been working closely with Mandy and the team both in DC and in North Carolina on a number of air issues, and believe a meeting to touch bases on those issues would be mutually beneficial as Mr. Wehrum continues to dig into his new role. I understand that he is incredibly busy, and only ask for about 30 minutes of his time in the coming weeks.

Thanks for your consideration.

Regards,  
Hilary

Hilary Moffett  
Director, Federal Relations  
American Petroleum Institute  
202-682-8040 (desk)  
612-710-8696 (cell)  
[MoffettH@api.org](mailto:MoffettH@api.org)

Message

---

**From:** Hilary Moffett [moffetth@api.org]  
**Sent:** 11/28/2017 10:05:28 PM  
**To:** Loving, Shanita [Loving.Shanita@epa.gov]  
**CC:** Atkinson, Emily [Atkinson.Emily@epa.gov]  
**Subject:** RE: Meeting Request for Bill Wehrum

Hi Shanita,

Thanks again for sending these times. We'll take Dec 13<sup>th</sup> from 2-230. I will send you an agenda and a list of attendees (and their company) next week. Will that provide enough lead time?

Regards,  
Hilary

---

**From:** Loving, Shanita [mailto:Loving.Shanita@epa.gov]  
**Sent:** Tuesday, November 28, 2017 3:30 PM  
**To:** Hilary Moffett  
**Cc:** Atkinson, Emily  
**Subject:** FW: Meeting Request for Bill Wehrum  
**Importance:** High

Hi Hilary,

Please see a list of dates/times slots that Bill will be available for a 30 minute meeting. Let us know which date and time will work best on your end.

**December 13<sup>th</sup>**  
2:00 – 3:00 pm

**December 14<sup>th</sup>**  
1:00 – 2:00 pm  
4:00 – 5:00 pm

Thanks!

Shanita Loving  
Staff Assistant  
Immediate Office of the Acting Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5406 B, WJC-North  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460  
Phone: 202-564-4728

---

**From:** Atkinson, Emily  
**Sent:** Monday, November 27, 2017 11:43 AM  
**To:** Hilary Moffett <moffetth@api.org>  
**Cc:** Loving, Shanita <Loving.Shanita@epa.gov>  
**Subject:** RE: Meeting Request for Bill Wehrum

Hi Hilary,

Thank you for the meeting request – we will review it and get back to you shortly.

Emily

Emily Atkinson  
Management Analyst/Office Manager  
Immediate Office of the Acting Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5412B, 1200 Pennsylvania Avenue NW  
Washington, DC 20460  
Voice: 202-564-1850  
Email: [atkinson.emily@epa.gov](mailto:atkinson.emily@epa.gov)

---

**From:** Hilary Moffett [<mailto:moffetth@api.org>]  
**Sent:** Monday, November 27, 2017 9:29 AM  
**To:** Loving, Shanita <[Loving.Shanita@epa.gov](mailto:Loving.Shanita@epa.gov)>  
**Cc:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>  
**Subject:** Meeting Request for Bill Wehrum

Good Morning Shanita,

I hope this email finds you well. A group of people from API and our member companies wanted to schedule a meeting with Assistant Administrator Wehrum to discuss priorities. We have been working closely with Mandy and the team both in DC and in North Carolina on a number of air issues, and believe a meeting to touch bases on those issues would be mutually beneficial as Mr. Wehrum continues to dig into his new role. I understand that he is incredibly busy, and only ask for about 30 minutes of his time in the coming weeks.

Thanks for your consideration.

Regards,  
Hilary

Hilary Moffett  
Director, Federal Relations  
American Petroleum Institute  
202-682-8040 (desk)  
612-710-8696 (cell)  
[MoffettH@api.org](mailto:MoffettH@api.org)

## Message

**From:** Hilary Moffett [moffetth@api.org]  
**Sent:** 6/29/2017 2:08:13 PM  
**To:** Dominguez, Alexander [dominguez.alexander@epa.gov]  
**CC:** Atkinson, Emily [Atkinson.Emily@epa.gov]; Gunasekara, Mandy [Gunasekara.Mandy@epa.gov]; Lewis, Josh [Lewis.Josh@epa.gov]  
**Subject:** Re: Methane Meeting request

Thank you Emily and Alex.

Let's schedule 10 am on the 18th for one hour. If we can confirm that, I will see which members of our team will be available to attend and can get you a list of attendees. I will also send you relevant documents as soon as possible.

Thanks again,  
Hilary

On Jun 29, 2017, at 9:28 AM, Dominguez, Alexander <dominguez.alexander@epa.gov> wrote:

Mandy is open during that window as well so works on our end. Please send the invite to Brittany Bolen and Samantha Dravis as well so they are aware.

Hilary – I defer to you on how much time you think is necessary. Also, if you can let Emily know who will be attending from your side and any other information or materials that should be reviewed beforehand.

Appreciate your help in setting this up Emily. Anything else just let me know.

Alex

**Alex Dominguez**

*Policy Analyst to the Senior Advisors to  
the Administrator for Air and Water*  
U.S. Environmental Protection Agency  
Work: 202-564-3164 | Cell: 202-578-5985

---

**From:** Atkinson, Emily  
**Sent:** Thursday, June 29, 2017 8:56 AM  
**To:** Dominguez, Alexander <dominguez.alexander@epa.gov>  
**Cc:** Hilary Moffett <moffetth@api.org>; Gunasekara, Mandy <Gunasekara.Mandy@epa.gov>; Lewis, Josh <Lewis.Josh@epa.gov>  
**Subject:** RE: Methane Meeting request

Hi Alex and Hilary,

OAR is happy to host this on the 5<sup>th</sup> floor and to send the meeting invite. Our list of participants is outlined below.

The best window for us is the morning of Tuesday, July 18 between 9am – 12pm. Please let me know how long you are looking to schedule this for and if there is a specific time in this window that works best for you, as well as if anyone else besides Mandy from your office needs an invite.

**OAR, OAQPS and OGC:** Sarah Dunham, Josh Lewis, Reid Harvey, Steve Page, Mike Koerber, Peter Tsirigotis, Dave Cozzie, Elliott Zenick

Thanks.  
Emily

Emily Atkinson  
Management Analyst/Office Manager  
Immediate Office of the Acting Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5412B, 1200 Pennsylvania Avenue NW  
Washington, DC 20460  
Voice: 202-564-1850  
Email: [atkinson.emily@epa.gov](mailto:atkinson.emily@epa.gov)

---

**From:** Lewis, Josh  
**Sent:** Thursday, June 29, 2017 7:58 AM  
**To:** Dominguez, Alexander <[dominguez.alexander@epa.gov](mailto:dominguez.alexander@epa.gov)>  
**Cc:** Hilary Moffett <[moffetth@api.org](mailto:moffetth@api.org)>; Gunasekara, Mandy <[Gunasekara.Mandy@epa.gov](mailto:Gunasekara.Mandy@epa.gov)>; Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>  
**Subject:** RE: Methane Meeting request

Yes we can do this. Adding Emily who can respond to this group with a suggested time, etc.

Josh Lewis  
Chief of Staff  
EPA/Office of Air and Radiation  
Office: 202 564 2095  
Cell: 202 329 2291

---

**From:** Dominguez, Alexander  
**Sent:** Wednesday, June 28, 2017 3:44 PM  
**To:** Lewis, Josh <[Lewis.Josh@epa.gov](mailto:Lewis.Josh@epa.gov)>  
**Cc:** Hilary Moffett <[moffetth@api.org](mailto:moffetth@api.org)>; Gunasekara, Mandy <[Gunasekara.Mandy@epa.gov](mailto:Gunasekara.Mandy@epa.gov)>  
**Subject:** FW: Methane Meeting request

Hey Josh,

Mandy requested I loop you in on this in hopes of setting up a videoconference with RTP in OARs conference room and having you and Sarah Dunham sit in as well. She is pretty open right now on July 18/19 and just let me know what you need on my end to help facilitate this. Appreciate it.

Alex

**Alex Dominguez**  
*Policy Analyst to the Senior Advisors to  
the Administrator for Air and Water*  
U.S. Environmental Protection Agency  
Work: 202-564-3164 | Cell: 202-578-5985

---

**From:** Hilary Moffett [<mailto:moffetth@api.org>]  
**Sent:** Tuesday, June 27, 2017 3:48 PM  
**To:** Dominguez, Alexander <[dominguez.alexander@epa.gov](mailto:dominguez.alexander@epa.gov)>  
**Subject:** Methane Meeting request

Hi Alex,

I hope this email finds you well. API was working with Mandy on the NSPS methane issue, and we would like to come in for a meeting with API, Mandy, and Peter (and others at RTP). We thought it would be helpful before we go down to RTP to discuss ways in which we believe the rule can be improved. Our team has spent a lot of time working through the details, and we would like to share those with you all and with RTP, via phone or videoconference.

Do you and Mandy have availability on July 18/19?

Thanks,  
Hilary

## Message

**From:** Bhandaram, Sundara [Sundara\_Bhandaram@afandpa.org]  
**Sent:** 7/10/2017 6:44:52 PM  
**To:** Loving, Shanita [Loving.Shanita@epa.gov]  
**Subject:** RE: Confirmed 7/27 at 1:00 pm ET: EPA - AF&PA and AWC Meeting

Great, thank you for the information.

---

**From:** Loving, Shanita [mailto:Loving.Shanita@epa.gov]  
**Sent:** Monday, July 10, 2017 2:40 PM  
**To:** Bhandaram, Sundara <Sundara\_Bhandaram@afandpa.org>  
**Subject:** Confirmed 7/27 at 1:00 pm ET: EPA - AF&PA and AWC Meeting  
**Importance:** High

You are confirmed for an hour meeting on Thursday, July 27<sup>th</sup> at 1:00 pm ET with Sarah Dunham and staff.  
Directions and procedures to 1200 Pennsylvania Avenue NW:

**Metro:** If you come by Metro get off at the Federal Triangle metro stop. Exit the metro station and go up two sets of escalators to the surface level and turn right. You will see a short staircase and wheelchair ramp leading to a set of glass doors with the EPA logo - that is the William Jefferson Clinton Federal Building, North Entrance.

**Taxi:** Direct the taxi to drop you off on 12th Street NW, between Constitution and Pennsylvania Avenues, at the elevator for the Federal Triangle metro stop - this is almost exactly half way between the two avenues on 12<sup>th</sup> Street NW. Facing the building with the EPA logo and American flags, walk toward the building and take the glass door on your right hand side with the escalators going down to the metro on your left – that is the North Lobby of the William Jefferson Clinton building.

**Security Procedures:** A government issued photo id is required to enter the building and it is suggested you arrive 15 minutes early in order to be cleared and arrive at the meeting room on time. Upon entering the lobby, the meeting attendees will be asked to pass through security and provide a photo ID for entrance. Let the guards know that you were instructed to call 202-564-7404 for a security escort.

Please send me a list of participants in advance of the meeting and feel free to contact me should you need any additional information.

Shanita Loving  
Staff Assistant  
Immediate Office of the Acting Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5406 B, WJC-North  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460  
Phone: 202-564-4728



Message

---

**From:** Loving, Shanita [Loving.Shanita@epa.gov]  
**Sent:** 7/10/2017 6:29:21 PM  
**To:** Bhandaram, Sundara [Sundara\_Bhandaram@afandpa.org]  
**Subject:** RE: Request for meeting with Sarah Dunham

Thank you.

Shanita Loving  
Staff Assistant  
Immediate Office of the Acting Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5406 B, WJC-North  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460  
Phone: 202-564-4728

---

**From:** Bhandaram, Sundara [mailto:Sundara\_Bhandaram@afandpa.org]  
**Sent:** Monday, July 10, 2017 2:21 PM  
**To:** Loving, Shanita <Loving.Shanita@epa.gov>  
**Subject:** RE: Request for meeting with Sarah Dunham

The names of the attendees are below:

1. Paul Noe, Vice President, Public Policy
2. Jerry Schwartz, Senior Director, Energy and Environmental Policy
3. Tim Hunt, Senior Director, Air Quality Programs
4. Stan Lancey, Chief Economist

Best,  
Sundara

---

**From:** Loving, Shanita [mailto:Loving.Shanita@epa.gov]  
**Sent:** Monday, July 10, 2017 2:06 PM  
**To:** Bhandaram, Sundara <Sundara\_Bhandaram@afandpa.org>  
**Subject:** RE: Request for meeting with Sarah Dunham

Thank you. Yes, please forward to me the names of the attendees so that I can forward to our security branch for entry into the building. I will forward to you a meeting confirmation shortly that will include building entry instructions.

Shanita Loving  
Staff Assistant  
Immediate Office of the Acting Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5406 B, WJC-North  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460  
Phone: 202-564-4728

---

**From:** Bhandaram, Sundara [mailto:Sundara\_Bhandaram@afandpa.org]  
**Sent:** Monday, July 10, 2017 1:50 PM  
**To:** Loving, Shanita <Loving.Shanita@epa.gov>

**Cc:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>

**Subject:** RE: Request for meeting with Sarah Dunham

Hi Shanita,

The time and date works with staffers. Please let me know if you need more information (e.g. attendance list, security clearance forms, etc.). Would you like me to send a calendar invite for the meeting? Also please let me know which entrance staff should use.

Thanks,  
Sundara

---

**From:** Loving, Shanita [<mailto:Loving.Shanita@epa.gov>]

**Sent:** Monday, July 10, 2017 12:48 PM

**To:** Bhandaram, Sundara <[Sundara\\_Bhandaram@afandpa.org](mailto:Sundara_Bhandaram@afandpa.org)>

**Cc:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>

**Subject:** RE: Request for meeting with Sarah Dunham

Good afternoon Sundara,

Sarah and her staff are available to meet with AF&PA and AWC on Thursday, July 27<sup>th</sup> at 1:00 pm. Will this time still work on your end?

Thanks,

Shanita Loving  
Staff Assistant  
Immediate Office of the Acting Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5406 B, WJC-North  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460  
Phone: 202-564-4728

---

**From:** Hunt, Tim [[mailto:Tim\\_Hunt@afandpa.org](mailto:Tim_Hunt@afandpa.org)]

**Sent:** Thursday, July 06, 2017 9:19 AM

**To:** Loving, Shanita <[Loving.Shanita@epa.gov](mailto:Loving.Shanita@epa.gov)>

**Cc:** Noe, Paul <[Paul\\_No@afandpa.org](mailto:Paul_No@afandpa.org)>; Bhandaram, Sundara <[Sundara\\_Bhandaram@afandpa.org](mailto:Sundara_Bhandaram@afandpa.org)>; Dunham, Sarah <[Dunham.Sarah@epa.gov](mailto:Dunham.Sarah@epa.gov)>

**Subject:** Request for meeting with Sarah Dunham

Shanita,

AF&PA and AWC would like to meet with Sarah Dunham to discuss several air issues impacting the paper and wood products industry as outlined in our May 15<sup>th</sup> comments to EPA. One critical issue is modernizing the air permitting program to encourage investments while maintaining environmental protections. We've been talking with OAQPS staff for several years on problems and solutions. Other key air issues include Boiler MACT, Pulp RTR and the upcoming Plywood and Composite Wood Products RTR.

Ideally we would like to meet the last week of July or first week of August for an hour ideally. Possible times are:

- July 27 at 1 PM
- July 28 at 3 PM
- July 31, 11, 1, or 2 PM

- August 1, 9, 10 or 3 PM
- August 2, 11, 1, 2 or 3 PM

The meeting would include Paul Noe, Jerry Schwartz, Stan Lancey, and myself. Please coordinate with Sundara Bhandaram on scheduling or other available times. If you have questions on the issues, please let me know.

Thank you.

**Timothy Hunt**

Senior Director, Air Quality Programs  
AMERICAN FOREST & PAPER ASSOCIATION  
AMERICAN WOOD COUNCIL  
1101 K Street, NW, Suite 700, Washington, DC 20005  
Office: 202-463-2588  
Email: [thunt@awc.org](mailto:thunt@awc.org) or [Tim\\_Hunt@afandpa.org](mailto:Tim_Hunt@afandpa.org)

Message

---

**From:** Tim\_hunt@afandpa.org [Tim\_hunt@afandpa.org]  
**Sent:** 7/6/2017 1:19:25 PM  
**To:** Loving, Shanita [Loving.Shanita@epa.gov]  
**CC:** Noe, Paul [Paul\_Noe@afandpa.org]; Bhandaram, Sundara [Sundara\_Bhandaram@afandpa.org]; Dunham, Sarah [Dunham.Sarah@epa.gov]  
**Subject:** Request for meeting with Sarah Dunham

Shanita,

AF&PA and AWC would like to meet with Sarah Dunham to discuss several air issues impacting the paper and wood products industry as outlined in our May 15<sup>th</sup> comments to EPA. One critical issue is modernizing the air permitting program to encourage investments while maintaining environmental protections. We've been talking with OAQPS staff for several years on problems and solutions. Other key air issues include Boiler MACT, Pulp RTR and the upcoming Plywood and Composite Wood Products RTR.

Ideally we would like to meet the last week of July or first week of August for an hour ideally. Possible times are:

- July 27 at 1 PM
- July 28 at 3 PM
- July 31, 11, 1, or 2 PM
- August 1, 9, 10 or 3 PM
- August 2, 11, 1, 2 or 3 PM

The meeting would include Paul Noe, Jerry Schwartz, Stan Lancey, and myself. Please coordinate with Sundara Bhandaram on scheduling or other available times. If you have questions on the issues, please let me know.

Thank you.

**Timothy Hunt**

Senior Director, Air Quality Programs  
AMERICAN FOREST & PAPER ASSOCIATION  
AMERICAN WOOD COUNCIL  
1101 K Street, NW, Suite 700, Washington, DC 20005  
Office: 202-463-2588  
Email: [thunt@awc.org](mailto:thunt@awc.org) or [Tim\\_Hunt@afandpa.org](mailto:Tim_Hunt@afandpa.org)

Appointment

---

**From:** Ghanta, Venu G [Venu.Ghanta@duke-energy.com]  
**Sent:** 12/4/2017 9:06:20 PM  
**To:** Loving, Shanita [Loving.Shanita@epa.gov]

**Subject:** Coffee  
**Location:** Peet's, 435 11th St NW

**Start:** 12/11/2017 4:00:00 PM  
**End:** 12/11/2017 4:45:00 PM  
**Show Time As:** Tentative

**Recurrence:** (none)

Appointment

---

**From:** Ghanta, Venu G [Venu.Ghanta@duke-energy.com]  
**Sent:** 11/6/2017 2:20:59 PM  
**To:** Loving, Shanita [Loving.Shanita@epa.gov]

**Subject:** Canceled: Coffee  
**Location:** Peet's, 435 11th St NW

**Start:** 11/6/2017 4:00:00 PM  
**End:** 11/6/2017 5:00:00 PM  
**Show Time As:** Free

**Importance:** High

**Recurrence:** (none)

## Message

**From:** Loving, Shanita [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=439CE9C2D2104080A1B5908D3402BF20-LOVING, SHANITA]  
**Sent:** 11/29/2017 4:25:58 PM  
**To:** Hilary Moffett [moffetth@api.org]  
**Subject:** Confirmed: 12/13 at 2:00 pm ET: EPA - API

**Importance:** High

You are confirmed for a 30 minute meeting on Wednesday, December 13<sup>th</sup> 2:00 – 2:30 pm ET with Bill Wehrum.

Directions and procedures to 1200 Pennsylvania Avenue NW:

**Metro:** If you come by Metro get off at the Federal Triangle metro stop. Exit the metro station and go up two sets of escalators to the surface level and turn right. You will see a short staircase and wheelchair ramp leading to a set of glass doors with the EPA logo - that is the William Jefferson Clinton Federal Building, North Entrance.

**Taxi:** Direct the taxi to drop you off on 12th Street NW, between Constitution and Pennsylvania Avenues, at the elevator for the Federal Triangle metro stop - this is almost exactly half way between the two avenues on 12<sup>th</sup> Street NW. Facing the building with the EPA logo and American flags, walk toward the building and take the glass door on your right hand side with the escalators going down to the metro on your left – that is the North Lobby of the William Jefferson Clinton building.

**Security Procedures:** A government issued photo id is required to enter the building and it is suggested you arrive 15 minutes early in order to be cleared and arrive at the meeting room on time. Upon entering the lobby, the meeting attendees will be asked to pass through security and provide a photo ID for entrance. Let the guards know that you were instructed to call 202-564-7404 for a security escort.

Please send me a list of participants in advance of the meeting and feel free to contact me should you need any additional information.

Shanita Loving  
 Staff Assistant  
 Immediate Office of the Assistant Administrator  
 Office of Air and Radiation, USEPA  
 Room 5406 B, WJC-North  
 1200 Pennsylvania Avenue, NW  
 Washington, DC 20460  
 Phone: 202-564-4728

---

**From:** Hilary Moffett [mailto:moffetth@api.org]  
**Sent:** Tuesday, November 28, 2017 5:05 PM  
**To:** Loving, Shanita <Loving.Shanita@epa.gov>  
**Cc:** Atkinson, Emily <Atkinson.Emily@epa.gov>  
**Subject:** RE: Meeting Request for Bill Wehrum

Hi Shanita,

Thanks again for sending these times. We'll take Dec 13<sup>th</sup> from 2-230. I will send you an agenda and a list of attendees (and their company) next week. Will that provide enough lead time?

Regards,

Hilary

---

**From:** Loving, Shanita [<mailto:Loving.Shanita@epa.gov>]  
**Sent:** Tuesday, November 28, 2017 3:30 PM  
**To:** Hilary Moffett  
**Cc:** Atkinson, Emily  
**Subject:** FW: Meeting Request for Bill Wehrum  
**Importance:** High

Hi Hilary,

Please see a list of dates/times slots that Bill will be available for a 30 minute meeting. Let us know which date and time will work best on your end.

**December 13<sup>th</sup>**  
2:00 – 3:00 pm

**December 14<sup>th</sup>**  
1:00 – 2:00 pm  
4:00 – 5:00 pm

Thanks!

Shanita Loving  
Staff Assistant  
Immediate Office of the Acting Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5406 B, WJC-North  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460  
Phone: 202-564-4728

---

**From:** Atkinson, Emily  
**Sent:** Monday, November 27, 2017 11:43 AM  
**To:** Hilary Moffett <[moffetth@api.org](mailto:moffetth@api.org)>  
**Cc:** Loving, Shanita <[Loving.Shanita@epa.gov](mailto:Loving.Shanita@epa.gov)>  
**Subject:** RE: Meeting Request for Bill Wehrum

Hi Hilary,

Thank you for the meeting request – we will review it and get back to you shortly.

Emily

Emily Atkinson  
Management Analyst/Office Manager  
Immediate Office of the Acting Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5412B, 1200 Pennsylvania Avenue NW  
Washington, DC 20460  
Voice: 202-564-1850  
Email: [atkinson.emily@epa.gov](mailto:atkinson.emily@epa.gov)



---

**From:** Hilary Moffett [<mailto:moffetth@api.org>]  
**Sent:** Monday, November 27, 2017 9:29 AM  
**To:** Loving, Shanita <[Loving.Shanita@epa.gov](mailto:Loving.Shanita@epa.gov)>  
**Cc:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>  
**Subject:** Meeting Request for Bill Wehrum

Good Morning Shanita,

I hope this email finds you well. A group of people from API and our member companies wanted to schedule a meeting with Assistant Administrator Wehrum to discuss priorities. We have been working closely with Mandy and the team both in DC and in North Carolina on a number of air issues, and believe a meeting to touch bases on those issues would be mutually beneficial as Mr. Wehrum continues to dig into his new role. I understand that he is incredibly busy, and only ask for about 30 minutes of his time in the coming weeks.

Thanks for your consideration.

Regards,  
Hilary

Hilary Moffett  
Director, Federal Relations  
American Petroleum Institute  
202-682-8040 (desk)  
612-710-8696 (cell)  
[MoffettH@api.org](mailto:MoffettH@api.org)

## Message

**From:** Loving, Shanita [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=439CE9C2D2104080A1B5908D3402BF20-LOVING, SHANITA]  
**Sent:** 11/29/2017 4:12:29 PM  
**To:** Hilary Moffett [moffetth@api.org]  
**CC:** Atkinson, Emily [Atkinson.Emily@epa.gov]  
**Subject:** RE: Meeting Request for Bill Wehrum

Hi Hilary,

Thank you for confirming your availability to meet with Bill. You will receive a meeting confirmation shortly. Yes, early next week if possible would be fine.

Shanita Loving  
 Staff Assistant  
 Immediate Office of the Acting Assistant Administrator  
 Office of Air and Radiation, USEPA  
 Room 5406 B, WJC-North  
 1200 Pennsylvania Avenue, NW  
 Washington, DC 20460  
 Phone: 202-564-4728

---

**From:** Hilary Moffett [mailto:moffetth@api.org]  
**Sent:** Tuesday, November 28, 2017 5:05 PM  
**To:** Loving, Shanita <Loving.Shanita@epa.gov>  
**Cc:** Atkinson, Emily <Atkinson.Emily@epa.gov>  
**Subject:** RE: Meeting Request for Bill Wehrum

Hi Shanita,

Thanks again for sending these times. We'll take Dec 13<sup>th</sup> from 2-230. I will send you an agenda and a list of attendees (and their company) next week. Will that provide enough lead time?

Regards,  
 Hilary

---

**From:** Loving, Shanita [mailto:Loving.Shanita@epa.gov]  
**Sent:** Tuesday, November 28, 2017 3:30 PM  
**To:** Hilary Moffett  
**Cc:** Atkinson, Emily  
**Subject:** FW: Meeting Request for Bill Wehrum  
**Importance:** High

Hi Hilary,

Please see a list of dates/times slots that Bill will be available for a 30 minute meeting. Let us know which date and time will work best on your end.

**December 13<sup>th</sup>**  
 2:00 – 3:00 pm

**December 14<sup>th</sup>**  
 1:00 – 2:00 pm

4:00 – 5:00 pm

Thanks!

Shanita Loving  
Staff Assistant  
Immediate Office of the Acting Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5406 B, WJC-North  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460  
Phone: 202-564-4728

---

**From:** Atkinson, Emily  
**Sent:** Monday, November 27, 2017 11:43 AM  
**To:** Hilary Moffett <[moffetth@api.org](mailto:moffetth@api.org)>  
**Cc:** Loving, Shanita <[Loving.Shanita@epa.gov](mailto:Loving.Shanita@epa.gov)>  
**Subject:** RE: Meeting Request for Bill Wehrum

Hi Hilary,

Thank you for the meeting request – we will review it and get back to you shortly.

Emily

Emily Atkinson  
Management Analyst/Office Manager  
Immediate Office of the Acting Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5412B, 1200 Pennsylvania Avenue NW  
Washington, DC 20460  
Voice: 202-564-1850  
Email: [atkinson.emily@epa.gov](mailto:atkinson.emily@epa.gov)

---

**From:** Hilary Moffett [<mailto:moffetth@api.org>]  
**Sent:** Monday, November 27, 2017 9:29 AM  
**To:** Loving, Shanita <[Loving.Shanita@epa.gov](mailto:Loving.Shanita@epa.gov)>  
**Cc:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>  
**Subject:** Meeting Request for Bill Wehrum

Good Morning Shanita,

I hope this email finds you well. A group of people from API and our member companies wanted to schedule a meeting with Assistant Administrator Wehrum to discuss priorities. We have been working closely with Mandy and the team both in DC and in North Carolina on a number of air issues, and believe a meeting to touch bases on those issues would be mutually beneficial as Mr. Wehrum continues to dig into his new role. I understand that he is incredibly busy, and only ask for about 30 minutes of his time in the coming weeks.

Thanks for your consideration.

Regards,  
Hilary

Hilary Moffett  
Director, Federal Relations  
American Petroleum Institute  
202-682-8040 (desk)  
612-710-8696 (cell)  
[MoffettH@api.org](mailto:MoffettH@api.org)

Message

---

**From:** Loving, Shanita [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=439CE9C2D2104080A1B5908D3402BF20-LOVING, SHANITA]  
**Sent:** 7/10/2017 6:28:49 PM  
**To:** Bhandaram, Sundara [Sundara\_Bhandaram@afandpa.org]  
**Subject:** RE: Request for meeting with Sarah Dunham

Thank you.

Shanita Loving  
Staff Assistant  
Immediate Office of the Acting Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5406 B, WJC-North  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460  
Phone: 202-564-4728

---

**From:** Bhandaram, Sundara [mailto:Sundara\_Bhandaram@afandpa.org]  
**Sent:** Monday, July 10, 2017 2:21 PM  
**To:** Loving, Shanita <Loving.Shanita@epa.gov>  
**Subject:** RE: Request for meeting with Sarah Dunham

The names of the attendees are below:

1. Paul Noe, Vice President, Public Policy
2. Jerry Schwartz, Senior Director, Energy and Environmental Policy
3. Tim Hunt, Senior Director, Air Quality Programs
4. Stan Lancey, Chief Economist

Best,  
Sundara

---

**From:** Loving, Shanita [mailto:Loving.Shanita@epa.gov]  
**Sent:** Monday, July 10, 2017 2:06 PM  
**To:** Bhandaram, Sundara <Sundara\_Bhandaram@afandpa.org>  
**Subject:** RE: Request for meeting with Sarah Dunham

Thank you. Yes, please forward to me the names of the attendees so that I can forward to our security branch for entry into the building. I will forward to you a meeting confirmation shortly that will include building entry instructions.

Shanita Loving  
Staff Assistant  
Immediate Office of the Acting Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5406 B, WJC-North  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460  
Phone: 202-564-4728

---

**From:** Bhandaram, Sundara [mailto:Sundara\_Bhandaram@afandpa.org]  
**Sent:** Monday, July 10, 2017 1:50 PM  
**To:** Loving, Shanita <Loving.Shanita@epa.gov>

**Cc:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>

**Subject:** RE: Request for meeting with Sarah Dunham

Hi Shanita,

The time and date works with staffers. Please let me know if you need more information (e.g. attendance list, security clearance forms, etc.). Would you like me to send a calendar invite for the meeting? Also please let me know which entrance staff should use.

Thanks,  
Sundara

---

**From:** Loving, Shanita [<mailto:Loving.Shanita@epa.gov>]

**Sent:** Monday, July 10, 2017 12:48 PM

**To:** Bhandaram, Sundara <[Sundara\\_Bhandaram@afandpa.org](mailto:Sundara_Bhandaram@afandpa.org)>

**Cc:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>

**Subject:** RE: Request for meeting with Sarah Dunham

Good afternoon Sundara,

Sarah and her staff are available to meet with AF&PA and AWC on Thursday, July 27<sup>th</sup> at 1:00 pm. Will this time still work on your end?

Thanks,

Shanita Loving  
Staff Assistant  
Immediate Office of the Acting Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5406 B, WJC-North  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460  
Phone: 202-564-4728

---

**From:** Hunt, Tim [[mailto:Tim\\_Hunt@afandpa.org](mailto:Tim_Hunt@afandpa.org)]

**Sent:** Thursday, July 06, 2017 9:19 AM

**To:** Loving, Shanita <[Loving.Shanita@epa.gov](mailto:Loving.Shanita@epa.gov)>

**Cc:** Noe, Paul <[Paul\\_Noel@afandpa.org](mailto:Paul_Noel@afandpa.org)>; Bhandaram, Sundara <[Sundara\\_Bhandaram@afandpa.org](mailto:Sundara_Bhandaram@afandpa.org)>; Dunham, Sarah <[Dunham.Sarah@epa.gov](mailto:Dunham.Sarah@epa.gov)>

**Subject:** Request for meeting with Sarah Dunham

Shanita,

AF&PA and AWC would like to meet with Sarah Dunham to discuss several air issues impacting the paper and wood products industry as outlined in our May 15<sup>th</sup> comments to EPA. One critical issue is modernizing the air permitting program to encourage investments while maintaining environmental protections. We've been talking with OAQPS staff for several years on problems and solutions. Other key air issues include Boiler MACT, Pulp RTR and the upcoming Plywood and Composite Wood Products RTR.

Ideally we would like to meet the last week of July or first week of August for an hour ideally. Possible times are:

- July 27 at 1 PM
- July 28 at 3 PM
- July 31, 11, 1, or 2 PM

- August 1, 9, 10 or 3 PM
- August 2, 11, 1, 2 or 3 PM

The meeting would include Paul Noe, Jerry Schwartz, Stan Lancey, and myself. Please coordinate with Sundara Bhandaram on scheduling or other available times. If you have questions on the issues, please let me know.

Thank you.

**Timothy Hunt**

Senior Director, Air Quality Programs  
AMERICAN FOREST & PAPER ASSOCIATION  
AMERICAN WOOD COUNCIL  
1101 K Street, NW, Suite 700, Washington, DC 20005  
Office: 202-463-2588  
Email: [thunt@awc.org](mailto:thunt@awc.org) or [Tim\\_Hunt@afandpa.org](mailto:Tim_Hunt@afandpa.org)

## Message

**From:** Loving, Shanita [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=439CE9C2D2104080A1B5908D3402BF20-LOVING, SHANITA]  
**Sent:** 3/15/2017 4:02:52 PM  
**To:** Barr Kelly J [Kelly.Barr@srpnet.com]  
**CC:** Wehrum, William L. [wwehr@hunton.com]; Montalvo Kara M [Kara.Montalvo@srpnet.com]; McClellan William J (Bill) [Bill.McClellan@srpnet.com]; Atkinson, Emily [Atkinson.Emily@epa.gov]  
**Subject:** RE: Confirmed 3/23 at 12:00 pm ET: EPA-Salt River Project

Hi Kelly,

You're welcome. Please see conference call information below.

Conference Number: Personal Phone / Ex. 6  
 Participant Code: Personal Phone / Ex. 6

Thank you.

Shanita Loving  
 Staff Assistant  
 Immediate Office of the Acting Assistant Administrator  
 Office of Air and Radiation, USEPA  
 Room 5406 B, WJC-North  
 1200 Pennsylvania Avenue, NW  
 Washington, DC 20460  
 Phone: 202-564-4728

---

**From:** Barr Kelly J [mailto:Kelly.Barr@srpnet.com]  
**Sent:** Wednesday, March 15, 2017 11:43 AM  
**To:** Loving, Shanita <Loving.Shanita@epa.gov>  
**Cc:** Wehrum, William L. <wwehr@hunton.com>; Montalvo Kara M <Kara.Montalvo@srpnet.com>; McClellan William J (Bill) <Bill.McClellan@srpnet.com>  
**Subject:** RE: Confirmed 3/23 at 12:00 pm ET: EPA-Salt River Project

Thank you Shanita. Our attorney, Bill Wehrum, will be joining me at the meeting. Since I believe that Region 9 will be joining us via conference call, could you please provide me with the conference call information so that two of my colleagues, Kara Montalvo and Bill McClellan, can join us by phone as well?

Thank you for your assistance in getting this scheduled.

Kelly

The information in this electronic communication is confidential and may be protected by the attorney-client privilege, common interest privilege, and/or attorney work product doctrine. It is intended solely for the addressee. Access to this e-mail by anyone else is unauthorized.

If you are not the intended recipient, any disclosure, copying, distribution of this message or any action taken or omitted to be taken in reliance on it, is prohibited and may be unlawful. Please notify us immediately of your receipt of this message by return e-mail, and destroy this communication and all copies thereof, including all attachments. Thank you.

Kelly J. Barr, Esq.

Senior Director, Environmental Management & Chief Sustainability and Compliance Executive



Phone (602) 236-5262 / Fax (602) 236-6690

---

**From:** Loving, Shanita [<mailto:Loving.Shanita@epa.gov>]  
**Sent:** Tuesday, March 14, 2017 12:31 PM  
**To:** Barr Kelly J <[Kelly.Barr@srpnet.com](mailto:Kelly.Barr@srpnet.com)>  
**Subject:** Confirmed 3/23 at 12:00 pm ET: EPA-Salt River Project  
**Importance:** High

\*\*\*SRP EXTERNAL EMAIL WARNING: WERE YOU EXPECTING THIS? IS IT CREDIBLE? IF NOT-REPORT IT! \*\*\*

---

You are confirmed for a 30 minute meeting on Thursday, March 23<sup>rd</sup> at 12:00 pm ET with Sarah Dunham and staff.

Directions and procedures to 1200 Pennsylvania Avenue NW:

**Metro:** If you come by Metro get off at the Federal Triangle metro stop. Exit the metro station and go up two sets of escalators to the surface level and turn right. You will see a short staircase and wheelchair ramp leading to a set of glass doors with the EPA logo - that is the William Jefferson Clinton Federal Building, North Entrance.

**Taxi:** Direct the taxi to drop you off on 12th Street NW, between Constitution and Pennsylvania Avenues, at the elevator for the Federal Triangle metro stop - this is almost exactly half way between the two avenues on 12<sup>th</sup> Street NW. Facing the building with the EPA logo and American flags, walk toward the building and take the glass door on your right hand side with the escalators going down to the metro on your left – that is the North Lobby of the William Jefferson Clinton building.

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Please send me a list of participants in advance of the meeting and feel free to contact me should you need any additional information.

Shanita Loving  
Staff Assistant  
Immediate Office of the Acting Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5406 B, WJC-North  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460  
Phone: 202-564-4728

## Appointment

**From:** Loving, Shanita [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=439CE9C2D2104080A1B5908D3402BF20-LOVING, SHANITA]  
**Sent:** 3/15/2017 3:48:57 PM  
**To:** Lewis, Josh [Lewis.Josh@epa.gov]; Jordan, Deborah [Jordan.Deborah@epa.gov]; McKaughan, Colleen [McKaughan.Colleen@epa.gov]; Koerber, Mike [Koerber.Mike@epa.gov]; Wood, Anna [Wood.Anna@epa.gov]; Jones, Rhea [Jones.Rhea@epa.gov]; Beaver, Melinda [Beaver.Melinda@epa.gov]; Werner, Christopher [Werner.Christopher@epa.gov]; Marks, Matthew [Marks.Matthew@epa.gov]  
**CC:** Lorang, Phil [Lorang.Phil@epa.gov]; Adams, Elizabeth [Adams.Elizabeth@epa.gov]; Anderson, Lea [anderson.lea@epa.gov]; Zenick, Elliott [Zenick.Elliott@epa.gov]  
**Subject:** Meeting with Kelly Barr re: Salt River Project (Confirmed)  
**Attachments:** Re: Meeting Request with Sarah Dunham on March 23, 2017.; Confirmed 3/23 at 12:00 pm ET: EPA-Salt River Project; RE: Meeting Request  
**Location:** WJC-N 5400 + Personal Phone / Ex. 6 Participant Code: Personal Phone / Ex. 6  
**Start:** 3/23/2017 4:00:00 PM  
**End:** 3/23/2017 4:30:00 PM  
**Show Time As:** Tentative

**To:** Dunham, Sarah; Lewis, Josh; Jordan, Debbie; McKaughan; Koerber, Mike; Wood, Anna; Jones, Rhea; Beaver, Melinda, Werner, Chris; Marks, Matthew; Adams, Elizabeth; Zenick, Elliott

**Outside Attendee (In person):**

- Kelly Barr, Senior Director
- Bill Wehrum
- Kara Montalvo **(By phone)**
- Bill McClellan **(By phone)**



Confirmed 3/23 at  
12:00 pm ET: EP...



Re: Meeting  
Request with Sar...



RE: Meeting  
Request

Message

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**From:** Loving, Shanita [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=439CE9C2D2104080A1B5908D3402BF20-LOVING, SHANITA]  
**Sent:** 3/14/2017 7:30:47 PM  
**To:** Barr Kelly J [Kelly.Barr@srpnet.com]  
**Subject:** Confirmed 3/23 at 12:00 pm ET: EPA-Salt River Project

**Importance:** High

You are confirmed for a 30 minute meeting on Thursday, March 23<sup>rd</sup> at 12:00 pm ET with Sarah Dunham and staff.

Directions and procedures to 1200 Pennsylvania Avenue NW:

**Metro:** If you come by Metro get off at the Federal Triangle metro stop. Exit the metro station and go up two sets of escalators to the surface level and turn right. You will see a short staircase and wheelchair ramp leading to a set of glass doors with the EPA logo - that is the William Jefferson Clinton Federal Building, North Entrance.

**Taxi:** Direct the taxi to drop you off on 12th Street NW, between Constitution and Pennsylvania Avenues, at the elevator for the Federal Triangle metro stop - this is almost exactly half way between the two avenues on 12<sup>th</sup> Street NW. Facing the building with the EPA logo and American flags, walk toward the building and take the glass door on your right hand side with the escalators going down to the metro on your left – that is the North Lobby of the William Jefferson Clinton building.

**Security Procedures:** A government issued photo id is required to enter the building and it is suggested you arrive 15 minutes early in order to be cleared and arrive at the meeting room on time. Upon entering the lobby, the meeting attendees will be asked to pass through security and provide a photo ID for entrance. Let the guards know that you were instructed to call 202-564-7404 for a security escort.

Please send me a list of participants in advance of the meeting and feel free to contact me should you need any additional information.

Shanita Loving  
Staff Assistant  
Immediate Office of the Acting Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5406 B, WJC-North  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460  
Phone: 202-564-4728

Message

---

**From:** Loving, Shanita [Loving.Shanita@epa.gov]  
**Sent:** 3/14/2017 6:55:16 PM  
**To:** Atkinson, Emily [Atkinson.Emily@epa.gov]  
**Subject:** RE: Meeting Request

Okay, will do. Thanks

Shanita Loving  
Staff Assistant  
Immediate Office of the Acting Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5406 B, WJC-North  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460  
Phone: 202-564-4728

---

**From:** Atkinson, Emily  
**Sent:** Tuesday, March 14, 2017 1:34 PM  
**To:** Loving, Shanita <Loving.Shanita@epa.gov>  
**Subject:** FW: Meeting Request

Hi Shanita,

Please contact the requestor Kelly Barr to setup this meeting for 30 minutes on Thursday, March 23. Below is the list of staff to invite and since Region 9 is included it should be after 11am but before 2pm, since Kelly Barr is only available until then.

Region 9 – Debbie Jordan and Colleen McKaughan  
OAQPS – Anna Wood, Rhea Jones, Melinda Beaver, Chris Werner, and Mike Koerber  
IO – Josh Lewis

Thanks!  
Emily

Emily Atkinson  
Management Analyst/Office Manager  
Immediate Office of the Acting Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5412B, 1200 Pennsylvania Avenue NW  
Washington, DC 20460  
Voice: 202-564-1850  
Email: [atkinson.emily@epa.gov](mailto:atkinson.emily@epa.gov)

---

**From:** Dunham, Sarah  
**Sent:** Tuesday, March 14, 2017 9:15 AM  
**To:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>  
**Subject:** Re: Meeting Request

Ok yes, thanks.

Sent from my iPhone

On Mar 14, 2017, at 9:11 AM, Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)> wrote:

Hi Sarah,

OAQPS is recommending you take this meeting. Let me know if you approve of the recommendation.

Thanks.  
Emily

---

**From:** Koerber, Mike  
**Sent:** Tuesday, March 14, 2017 7:13 AM  
**To:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>  
**Subject:** RE: Meeting Request

Emily – I think Sarah should accept this meeting. Please invite:

Region 9 – Debbie and Colleen  
OAQPS – Anna Wood, Rhea Jones, Melinda Beaver, Chris Werner, and me

Thanks.

Mike

---

**From:** Dunham, Sarah  
**Sent:** Monday, March 13, 2017 8:45 PM  
**To:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>; Koerber, Mike <[Koerber.Mike@epa.gov](mailto:Koerber.Mike@epa.gov)>; Page, Steve <[Page.Steve@epa.gov](mailto:Page.Steve@epa.gov)>  
**Subject:** Fwd: Meeting Request

Sent from my iPhone

Begin forwarded message:

**From:** Barr Kelly J <[Kelly.Barr@srpnet.com](mailto:Kelly.Barr@srpnet.com)>  
**Date:** March 13, 2017 at 8:04:36 PM EDT  
**To:** "Sarah Dunham ([Dunham.sarah@epa.gov](mailto:Dunham.sarah@epa.gov))" <[Dunham.sarah@epa.gov](mailto:Dunham.sarah@epa.gov)>  
**Cc:** Deborah Jordan <[Jordan.Deborah@epamail.epa.gov](mailto:Jordan.Deborah@epamail.epa.gov)>, Colleen McKaughan <[McKaughan.Colleen@epamail.epa.gov](mailto:McKaughan.Colleen@epamail.epa.gov)>  
**Subject:** Meeting Request

Hello Sarah,

I will be in DC on Thursday, March 23<sup>rd</sup> and would like to request some time to visit with you regarding a Regional Haze solution that we have jointly developed with EPA Region 9 for the Coronado Generating Station, located in the rural community of St. Johns, Arizona. I believe we will need about an hour and am hopeful that Debbie and Colleen can participate in the discussion by phone.

I am available all day on the 23<sup>rd</sup> until 2pm. Can you please let me know if this might work for you?

Please feel free to include any other EPA folks you would like to attend. This innovative approach may be of interest to the incoming administration as it will require seasonal curtailments of one of the generating units at the station (rather than either installing a SCR or closing the unit) and will achieve better visibility improvements than the BART initially proposed by EPA.

Thank you for your consideration.

Best regards,

Kelly

The information in this electronic communication is confidential and may be protected by the attorney-client privilege, common interest privilege, and/or attorney work product doctrine. It is intended solely for the addressee. Access to this e-mail by anyone else is unauthorized.

If you are not the intended recipient, any disclosure, copying, distribution of this message or any action taken or omitted to be taken in reliance on it, is prohibited and may be unlawful. Please notify us immediately of your receipt of this message by return e-mail, and destroy this communication and all copies thereof, including all attachments. Thank you.

Kelly J. Barr, Esq.

Senior Director, Environmental Management & Chief Sustainability and Compliance  
Executive, SRP

Phone (602) 236-5262 / Fax (602) 236-6690

Message

---

**From:** Barr Kelly J [Kelly.Barr@srpnet.com]  
**Sent:** 3/14/2017 7:10:18 PM  
**To:** Loving, Shanita [Loving.Shanita@epa.gov]  
**CC:** Atkinson, Emily [Atkinson.Emily@epa.gov]; Boos Christina H (Christy) [Christy.Boos@srpnet.com]  
**Subject:** Re: Meeting Request with Sarah Dunham on March 23, 2017.

Yes. That would be great. Thanks so much.

Kelly

Kelly J. Barr  
Senior Director, Environmental Management and Chief Sustainability and Compliance Executive  
SRP

On Mar 14, 2017, at 12:08 PM, Loving, Shanita <Loving.Shanita@epa.gov<mailto:Loving.Shanita@epa.gov>> wrote:

\*\*\*SRP EXTERNAL EMAIL WARNING: WERE YOU EXPECTING THIS? IS IT CREDIBLE? IF NOT- REPORT IT! \*\*\*

---

Good afternoon Kelly,

Sarah Dunham will be available to meet with you on March 23rd at 12:00 pm. Will this time work for you?

Shanita Loving  
Staff Assistant  
Immediate Office of the Acting Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5406 B, WJC-North  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460  
Phone: 202-564-4728

Message

---

**From:** Loving, Shanita [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=439CE9C2D2104080A1B5908D3402BF20-LOVING, SHANITA]  
**Sent:** 3/14/2017 7:30:51 PM  
**To:** Barr Kelly J [Kelly.Barr@srpnet.com]  
**Subject:** Confirmed 3/23 at 12:00 pm ET: EPA-Salt River Project

**Importance:** High

You are confirmed for a 30 minute meeting on Thursday, March 23<sup>rd</sup> at 12:00 pm ET with Sarah Dunham and staff.

Directions and procedures to 1200 Pennsylvania Avenue NW:

Metro: If you come by Metro get off at the Federal Triangle metro stop. Exit the metro station and go up two sets of escalators to the surface level and turn right. You will see a short staircase and wheelchair ramp leading to a set of glass doors with the EPA logo - that is the William Jefferson Clinton Federal Building, North Entrance.

Taxi: Direct the taxi to drop you off on 12th Street NW, between Constitution and Pennsylvania Avenues, at the elevator for the Federal Triangle metro stop - this is almost exactly half way between the two avenues on 12<sup>th</sup> Street NW. Facing the building with the EPA logo and American flags, walk toward the building and take the glass door on your right hand side with the escalators going down to the metro on your left – that is the North Lobby of the William Jefferson Clinton building.

Security Procedures: A government issued photo id is required to enter the building and it is suggested you arrive 15 minutes early in order to be cleared and arrive at the meeting room on time. Upon entering the lobby, the meeting attendees will be asked to pass through security and provide a photo ID for entrance. Let the guards know that you were instructed to call 202-564-7404 for a security escort.

Please send me a list of participants in advance of the meeting and feel free to contact me should you need any additional information.

Shanita Loving  
Staff Assistant  
Immediate Office of the Acting Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5406 B, WJC-North  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460  
Phone: 202-564-4728



Message

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**From:** Loving, Shanita [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=439CE9C2D2104080A1B5908D3402BF20-LOVING, SHANITA]  
**Sent:** 12/6/2017 7:22:43 PM  
**To:** Hilary Moffett [moffetth@api.org]  
**Subject:** RE: Meeting Request for Bill Wehrum

You're welcome.

Shanita Loving  
Staff Assistant  
Immediate Office of the Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5406 B, WJC-North  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460  
Phone: 202-564-4728

---

**From:** Hilary Moffett [mailto:moffetth@api.org]  
**Sent:** Wednesday, December 06, 2017 2:11 PM  
**To:** Loving, Shanita <Loving.Shanita@epa.gov>  
**Subject:** RE: Meeting Request for Bill Wehrum

Great—thanks again for your help.

---

**From:** Loving, Shanita [mailto:Loving.Shanita@epa.gov]  
**Sent:** Wednesday, December 06, 2017 2:05 PM  
**To:** Hilary Moffett  
**Subject:** RE: Meeting Request for Bill Wehrum

Thank you Hilary. There is nothing else we will need from you. Please use call-in information below on December 13<sup>th</sup>.

**Dial in Number:** Personal Phone / Ex. 6  
**Participant Code:**

Thanks.

Shanita Loving  
Staff Assistant  
Immediate Office of the Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5406 B, WJC-North  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460  
Phone: 202-564-4728

---

**From:** Hilary Moffett [mailto:moffetth@api.org]  
**Sent:** Tuesday, December 05, 2017 3:15 PM  
**To:** Loving, Shanita <Loving.Shanita@epa.gov>  
**Subject:** RE: Meeting Request for Bill Wehrum

Hi Shanita,

The primary topics we plan to discuss are: methane, ozone, and RFS.

The attendees, at this point, are:

Hilary Moffett, API  
Stephen Higley, Marathon Petroleum  
Dale Thanjan, Phillips 66  
Kate Fay, Noble  
Marni Funk, Shell  
David van Hoogstraten, BP  
Matt Todd, API  
Puneet Verma, Chevron  
Brandon Kirkham  
Khary Cauthen, API  
Robert Nolan, Exxon Mobil  
Kevin Avery, ConocoPhillips  
Howard Feldman, API  
John Wagner, API  
Sara Glenn, Shell  
Rebecca Rosen, Devon

Jill Cooper, Anadarko, would like to call in from Colorado.

We will not be using any handouts. Please let me know if you need additional information from me.

Thanks,  
Hilary

---

**From:** Loving, Shanita [<mailto:Loving.Shanita@epa.gov>]  
**Sent:** Monday, December 04, 2017 1:38 PM  
**To:** Hilary Moffett  
**Subject:** RE: Meeting Request for Bill Wehrum  
**Importance:** High

Hi Hilary,

Would you please provide a list of attendees (names/titles) that will be joining this meeting in person and those who plan to participate via phone.

Thank you,

Shanita Loving  
Staff Assistant  
Immediate Office of the Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5406 B, WJC-North  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460  
Phone: 202-564-4728

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**From:** Hilary Moffett [<mailto:moffetth@api.org>]  
**Sent:** Monday, December 04, 2017 11:27 AM

**To:** Loving, Shanita <[Loving.Shanita@epa.gov](mailto:Loving.Shanita@epa.gov)>

**Subject:** RE: Meeting Request for Bill Wehrum

Hi Shanita,

Thanks for your email. Is it possible to have a phone in the room? We have some folks from afar that would like to call in. I can use my conference number and those that dial in will remain on mute. I'd just like for them to have the chance to listen.

Thanks,  
Hilary

---

**From:** Loving, Shanita [<mailto:Loving.Shanita@epa.gov>]

**Sent:** Wednesday, November 29, 2017 11:16 AM

**To:** Hilary Moffett

**Subject:** RE: Meeting Request for Bill Wehrum

You are confirmed for a 30 minute meeting on Wednesday, December 13<sup>th</sup> 2:00 – 2:30 pm ET with Bill Wehrum.

Directions and procedures to 1200 Pennsylvania Avenue NW:

Metro: If you come by Metro get off at the Federal Triangle metro stop. Exit the metro station and go up two sets of escalators to the surface level and turn right. You will see a short staircase and wheelchair ramp leading to a set of glass doors with the EPA logo - that is the William Jefferson Clinton Federal Building, North Entrance.

Taxi: Direct the taxi to drop you off on 12th Street NW, between Constitution and Pennsylvania Avenues, at the elevator for the Federal Triangle metro stop - this is almost exactly half way between the two avenues on 12<sup>th</sup> Street NW. Facing the building with the EPA logo and American flags, walk toward the building and take the glass door on your right hand side with the escalators going down to the metro on your left – that is the North Lobby of the William Jefferson Clinton building.

Security Procedures: A government issued photo id is required to enter the building and it is suggested you arrive 15 minutes early in order to be cleared and arrive at the meeting room on time. Upon entering the lobby, the meeting attendees will be asked to pass through security and provide a photo ID for entrance. Let the guards know that you were instructed to call 202-564-7404 for a security escort.

Please send me a list of participants in advance of the meeting and feel free to contact me should you need any additional information.

Shanita Loving  
Staff Assistant  
Immediate Office of the Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5406 B, WJC-North  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460  
Phone: 202-564-4728

---

**From:** Hilary Moffett [<mailto:moffetth@api.org>]

**Sent:** Tuesday, November 28, 2017 5:05 PM

**To:** Loving, Shanita <[Loving.Shanita@epa.gov](mailto:Loving.Shanita@epa.gov)>

**Cc:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>

**Subject:** RE: Meeting Request for Bill Wehrum

Hi Shanita,

Thanks again for sending these times. We'll take Dec 13<sup>th</sup> from 2-230. I will send you an agenda and a list of attendees (and their company) next week. Will that provide enough lead time?

Regards,  
Hilary

---

**From:** Loving, Shanita [<mailto:Loving.Shanita@epa.gov>]  
**Sent:** Tuesday, November 28, 2017 3:30 PM  
**To:** Hilary Moffett  
**Cc:** Atkinson, Emily  
**Subject:** FW: Meeting Request for Bill Wehrum  
**Importance:** High

Hi Hilary,

Please see a list of dates/times slots that Bill will be available for a 30 minute meeting. Let us know which date and time will work best on your end.

**December 13<sup>th</sup>**  
2:00 – 3:00 pm

**December 14<sup>th</sup>**  
1:00 – 2:00 pm  
4:00 – 5:00 pm

Thanks!

Shanita Loving  
Staff Assistant  
Immediate Office of the Acting Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5406 B, WJC-North  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460  
Phone: 202-564-4728

---

**From:** Atkinson, Emily  
**Sent:** Monday, November 27, 2017 11:43 AM  
**To:** Hilary Moffett <[moffetth@api.org](mailto:moffetth@api.org)>  
**Cc:** Loving, Shanita <[Loving.Shanita@epa.gov](mailto:Loving.Shanita@epa.gov)>  
**Subject:** RE: Meeting Request for Bill Wehrum

Hi Hilary,

Thank you for the meeting request – we will review it and get back to you shortly.

Emily

Emily Atkinson  
Management Analyst/Office Manager

Immediate Office of the Acting Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5412B, 1200 Pennsylvania Avenue NW  
Washington, DC 20460  
Voice: 202-564-1850  
Email: [atkinson.emily@epa.gov](mailto:atkinson.emily@epa.gov)

---

**From:** Hilary Moffett [<mailto:moffetth@api.org>]  
**Sent:** Monday, November 27, 2017 9:29 AM  
**To:** Loving, Shanita <[Loving.Shanita@epa.gov](mailto:Loving.Shanita@epa.gov)>  
**Cc:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>  
**Subject:** Meeting Request for Bill Wehrum

Good Morning Shanita,

I hope this email finds you well. A group of people from API and our member companies wanted to schedule a meeting with Assistant Administrator Wehrum to discuss priorities. We have been working closely with Mandy and the team both in DC and in North Carolina on a number of air issues, and believe a meeting to touch bases on those issues would be mutually beneficial as Mr. Wehrum continues to dig into his new role. I understand that he is incredibly busy, and only ask for about 30 minutes of his time in the coming weeks.

Thanks for your consideration.

Regards,  
Hilary

Hilary Moffett  
Director, Federal Relations  
American Petroleum Institute  
202-682-8040 (desk)  
612-710-8696 (cell)  
[MoffettH@api.org](mailto:MoffettH@api.org)

## Message

**From:** Loving, Shanita [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=439CE9C2D2104080A1B5908D3402BF20-LOVING, SHANITA]  
**Sent:** 12/4/2017 6:37:57 PM  
**To:** Hilary Moffett [moffetth@api.org]  
**Subject:** RE: Meeting Request for Bill Wehrum

**Importance:** High

Hi Hilary,

Would you please provide a list of attendees (names/titles) that will be joining this meeting in person and those who plan to participate via phone.

Thank you,

Shanita Loving  
 Staff Assistant  
 Immediate Office of the Assistant Administrator  
 Office of Air and Radiation, USEPA  
 Room 5406 B, WJC-North  
 1200 Pennsylvania Avenue, NW  
 Washington, DC 20460  
 Phone: 202-564-4728

---

**From:** Hilary Moffett [mailto:moffetth@api.org]  
**Sent:** Monday, December 04, 2017 11:27 AM  
**To:** Loving, Shanita <Loving.Shanita@epa.gov>  
**Subject:** RE: Meeting Request for Bill Wehrum

Hi Shanita,

Thanks for your email. Is it possible to have a phone in the room? We have some folks from afar that would like to call in. I can use my conference number and those that dial in will remain on mute. I'd just like for them to have the chance to listen.

Thanks,  
 Hilary

---

**From:** Loving, Shanita [mailto:Loving.Shanita@epa.gov]  
**Sent:** Wednesday, November 29, 2017 11:16 AM  
**To:** Hilary Moffett  
**Subject:** RE: Meeting Request for Bill Wehrum

You are confirmed for a 30 minute meeting on Wednesday, December 13<sup>th</sup> 2:00 – 2:30 pm ET with Bill Wehrum.

Directions and procedures to 1200 Pennsylvania Avenue NW:

Metro: If you come by Metro get off at the Federal Triangle metro stop. Exit the metro station and go up two sets of escalators to the surface level and turn right. You will see a short staircase and wheelchair ramp leading to a set of glass doors with the EPA logo - that is the William Jefferson Clinton Federal Building, North Entrance.

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Please send me a list of participants in advance of the meeting and feel free to contact me should you need any additional information.

Shanita Loving  
Staff Assistant  
Immediate Office of the Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5406 B, WJC-North  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460  
Phone: 202-564-4728

---

**From:** Hilary Moffett [<mailto:moffetth@api.org>]  
**Sent:** Tuesday, November 28, 2017 5:05 PM  
**To:** Loving, Shanita <[Loving.Shanita@epa.gov](mailto:Loving.Shanita@epa.gov)>  
**Cc:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>  
**Subject:** RE: Meeting Request for Bill Wehrum

Hi Shanita,

Thanks again for sending these times. We'll take Dec 13<sup>th</sup> from 2-230. I will send you an agenda and a list of attendees (and their company) next week. Will that provide enough lead time?

Regards,  
Hilary

---

**From:** Loving, Shanita [<mailto:Loving.Shanita@epa.gov>]  
**Sent:** Tuesday, November 28, 2017 3:30 PM  
**To:** Hilary Moffett  
**Cc:** Atkinson, Emily  
**Subject:** FW: Meeting Request for Bill Wehrum  
**Importance:** High

Hi Hilary,

Please see a list of dates/times slots that Bill will be available for a 30 minute meeting. Let us know which date and time will work best on your end.

**December 13<sup>th</sup>**  
2:00 – 3:00 pm

**December 14<sup>th</sup>**  
1:00 – 2:00 pm

4:00 – 5:00 pm

Thanks!

Shanita Loving  
Staff Assistant  
Immediate Office of the Acting Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5406 B, WJC-North  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460  
Phone: 202-564-4728

---

**From:** Atkinson, Emily  
**Sent:** Monday, November 27, 2017 11:43 AM  
**To:** Hilary Moffett <[moffetth@api.org](mailto:moffetth@api.org)>  
**Cc:** Loving, Shanita <[Loving.Shanita@epa.gov](mailto:Loving.Shanita@epa.gov)>  
**Subject:** RE: Meeting Request for Bill Wehrum

Hi Hilary,

Thank you for the meeting request – we will review it and get back to you shortly.

Emily

Emily Atkinson  
Management Analyst/Office Manager  
Immediate Office of the Acting Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5412B, 1200 Pennsylvania Avenue NW  
Washington, DC 20460  
Voice: 202-564-1850  
Email: [atkinson.emily@epa.gov](mailto:atkinson.emily@epa.gov)

---

**From:** Hilary Moffett [<mailto:moffetth@api.org>]  
**Sent:** Monday, November 27, 2017 9:29 AM  
**To:** Loving, Shanita <[Loving.Shanita@epa.gov](mailto:Loving.Shanita@epa.gov)>  
**Cc:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>  
**Subject:** Meeting Request for Bill Wehrum

Good Morning Shanita,

I hope this email finds you well. A group of people from API and our member companies wanted to schedule a meeting with Assistant Administrator Wehrum to discuss priorities. We have been working closely with Mandy and the team both in DC and in North Carolina on a number of air issues, and believe a meeting to touch bases on those issues would be mutually beneficial as Mr. Wehrum continues to dig into his new role. I understand that he is incredibly busy, and only ask for about 30 minutes of his time in the coming weeks.

Thanks for your consideration.

Regards,  
Hilary



Hilary Moffett  
Director, Federal Relations  
American Petroleum Institute  
202-682-8040 (desk)  
612-710-8696 (cell)  
[MoffettH@api.org](mailto:MoffettH@api.org)

## Message

**From:** Dominguez, Alexander [dominguez.alexander@epa.gov]  
**Sent:** 4/20/2018 11:43:06 AM  
**To:** Hilary Moffett [moffetth@api.org]  
**CC:** Atkinson, Emily [Atkinson.Emily@epa.gov]; DeLuca, Isabel [DeLuca.Isabel@epa.gov]  
**Subject:** RE: May 1 API Legal Committee Call

Confirmed for Tuesday, May 1<sup>st</sup> 12:00 EST.

---

**From:** Hilary Moffett [mailto:moffetth@api.org]  
**Sent:** Friday, April 20, 2018 7:37 AM  
**To:** Dominguez, Alexander <dominguez.alexander@epa.gov>  
**Subject:** Re: May 1 API Legal Committee Call

Great. Let's block 12-12:45. Thanks Alex.

On Apr 20, 2018, at 7:17 AM, Dominguez, Alexander <[dominguez.alexander@epa.gov](mailto:dominguez.alexander@epa.gov)> wrote:

Morning Hilary,

Happy Friday and apologies for the delay getting back to you – working out some logistical details on our end as Mandy will be on travel that day. Between 11:00 - 1:00 EST would work great. She'll just need to wrap up around 12:45 so whatever time in there you think would be best.

Alex

---

**From:** Hilary Moffett [mailto:moffetth@api.org]  
**Sent:** Tuesday, April 17, 2018 9:24 AM  
**To:** Dominguez, Alexander <[dominguez.alexander@epa.gov](mailto:dominguez.alexander@epa.gov)>  
**Subject:** FW: May 1 API Legal Committee Call

Hi Alex,

Attached is the form. We can make the day as open as needed for Mandy ☺ What about noon EST? or 3pm EST?

Thanks,  
Hilary

---

**From:** Dominguez, Alexander [mailto:[dominguez.alexander@epa.gov](mailto:dominguez.alexander@epa.gov)]  
**Sent:** Monday, April 16, 2018 3:38 PM  
**To:** Hilary Moffett  
**Cc:** Mara E. Zimmerman; Gunasekara, Mandy; DeLuca, Isabel; Atkinson, Emily  
**Subject:** RE: May 1 API Legal Committee Call

Hey Hilary,

Hope you had a good weekend and were able to enjoy the great weather on Saturday.

Mandy will likely be in transit at 10:00AM EST on May 1<sup>st</sup>, so to err on the side of caution we will likely want to try for another time slot. Have any other times already been booked or if the day is still pretty open? Additionally, if you could please fill out and return the attached event form that would be much appreciated.

Best,  
Alex

**Alex Dominguez**

Policy Analyst to the Principal Deputy  
Office of Air and Radiation  
U.S. Environmental Protection Agency

---

**From:** Hilary Moffett [<mailto:moffetth@api.org>]  
**Sent:** Thursday, April 12, 2018 11:52 AM  
**To:** Gunasekara, Mandy <[Gunasekara.Mandy@epa.gov](mailto:Gunasekara.Mandy@epa.gov)>  
**Cc:** Dominguez, Alexander <[dominguez.alexander@epa.gov](mailto:dominguez.alexander@epa.gov)>; Mara E. Zimmerman <[ZimmermanM@api.org](mailto:ZimmermanM@api.org)>  
**Subject:** May 1 API Legal Committee Call

Hi Mandy,

I hope this email finds you well. Thanks for agreeing to chat with API's Subcommittee on Environmental, Health, and Safety Law on May 1. The group has their meeting in Houston from 930-400 EST. Are you able to call in at 10:00am EST? The day is pretty open, but I always suggest trying to go first, so you know they're on schedule. If you have a different preferred time, just let me know and we'll make it happen. The group is the legal arm of API's thought on anything environmental related.

I will be in touch with more details about attendees in the near future.

Thanks,  
Hilary

Hilary Moffett  
Director, Federal Relations  
American Petroleum Institute  
202-682-8040 (desk)  
612-710-8696 (cell)  
[MoffettH@api.org](mailto:MoffettH@api.org)

Message

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**From:** Baer, Louis [LBaer@cement.org]  
**Sent:** 4/23/2018 3:22:03 PM  
**To:** DeLuca, Isabel [DeLuca.Isabel@epa.gov]  
**CC:** Atkinson, Emily [Atkinson.Emily@epa.gov]; Franklin, Charles [CFranklin@cement.org]; Derby, Rachel [RDerby@cement.org]  
**Subject:** RE: NACA Fly-In Speaking Confirmation - Bill Wehrum

Thank you Isabel! Your help is much appreciated.

---

Louis A. Baer, Esq., CPEA  
Director/Assistant Counsel, Government Affairs  
Portland Cement Association  
1150 Connecticut Avenue NW, Suite 500  
Office: 202-719-1981  
Cell: 314-922-8041  
[lbaer@cement.org](mailto:lbaer@cement.org)  
[www.cement.org](http://www.cement.org)

---

**From:** DeLuca, Isabel [mailto:DeLuca.Isabel@epa.gov]  
**Sent:** Monday, April 23, 2018 11:13 AM  
**To:** Baer, Louis <LBaer@cement.org>  
**Cc:** Atkinson, Emily <Atkinson.Emily@epa.gov>; Franklin, Charles <CFranklin@cement.org>; Derby, Rachel <RDerby@cement.org>  
**Subject:** RE: NACA Fly-In Speaking Confirmation - Bill Wehrum

Thank you, Louis! These details have been added to Bill's calendar so he'll have these instructions and your contact info on hand. If we have any further questions we'll let you know.

Best wishes,  
Isabel

---

**From:** Baer, Louis [mailto:LBaer@cement.org]  
**Sent:** Monday, April 23, 2018 11:09 AM  
**To:** DeLuca, Isabel <DeLuca.Isabel@epa.gov>  
**Cc:** Atkinson, Emily <Atkinson.Emily@epa.gov>; Franklin, Charles <CFranklin@cement.org>; Derby, Rachel <RDerby@cement.org>  
**Subject:** NACA Fly-In Speaking Confirmation - Bill Wehrum

Isabel,

We hope you had a great weekend. We are very much looking forward to having Bill Wehrum be our keynote speaker at the NACA Fly-In tomorrow evening, April 24<sup>th</sup>. The event will be held at the Newsuem Rooftop at 555 Pennsylvania Avenue NW on the 8<sup>th</sup> Floor. Mr. Wehrum is scheduled to speak at 6:45 PM. When he arrives, please have him come to the 8<sup>th</sup> Floor. I'm also happy to meet him in the lobby if he prefers. We will have a podium and microphone for him to address our group. After his remarks, there will be a short Q&A session.

Thank you very much for helping to arrange this opportunity to hear Mr. Wehrum speak. It will be very informative and rewarding for our members. If you or Mr. Wehrum need to contact me with help with logistics or anything else tomorrow in preparation for the event, my cell is (314) 922-8041. We are looking forward to tomorrow.

Best,  
Louis

---

Louis A. Baer, Esq., CPEA  
Director/Assistant Counsel, Government Affairs  
Portland Cement Association  
1150 Connecticut Avenue NW, Suite 500  
Office: 202-719-1981  
Cell: 314-922-8041  
[lbaer@cement.org](mailto:lbaer@cement.org)  
[www.cement.org](http://www.cement.org)

Message

---

**From:** Will Hupman [HupmanW@api.org]  
**Sent:** 2/13/2018 9:09:43 PM  
**To:** Atkinson, Emily [Atkinson.Emily@epa.gov]  
**Subject:** RE: meeting request with Bill Wehrum -- March 6th

Thanks again, Emily! I'm sure we'll be reaching out again soon. Hope the rest of your week is smooth sailing. Will

---

Will Hupman  
Director - Federal Relations | American Petroleum Institute  
desk: 202-682-8396 | cell: 202-615-7192 | hupmanw@api.org

---

**From:** Atkinson, Emily [mailto:Atkinson.Emily@epa.gov]  
**Sent:** Tuesday, February 13, 2018 3:48 PM  
**To:** Will Hupman  
**Subject:** RE: meeting request with Bill Wehrum -- March 6th

Hi Will,

Thank you for letting me know. I will go ahead and release the hold I had on for Bill Wehrum and Mandy Gunasekara.

If I can be of help in the future, feel free to give me a call or send me an email.

Emily Atkinson  
Management Analyst/Office Manager  
Immediate Office of the Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5412B, 1200 Pennsylvania Avenue NW  
Washington, DC 20460  
Voice: 202-564-1850  
Email: [atkinson.emily@epa.gov](mailto:atkinson.emily@epa.gov)

---

**From:** Will Hupman [mailto:HupmanW@api.org]  
**Sent:** Tuesday, February 13, 2018 2:58 PM  
**To:** Atkinson, Emily <Atkinson.Emily@epa.gov>  
**Subject:** RE: meeting request with Bill Wehrum -- March 6th

Thank you, Emily. I understand regarding the timing of Mr. Wehrum's recusal statement. Mandy is tremendous!! I know her from when we worked on the Hill together.

I checked in with our Execs, and they noted that they haven't had a chance to sit down with Ryan Jackson. So, given the variables, they asked that I reach out to him for March 6<sup>th</sup>. We'll certainly look forward to having a chance to talk with Mr. Wehrum once the recusal statement is finalized. Thank you again, Will

---

Will Hupman  
Director - Federal Relations | American Petroleum Institute  
desk: 202-682-8396 | cell: 202-615-7192 | hupmanw@api.org

---

**From:** Atkinson, Emily [<mailto:Atkinson.Emily@epa.gov>]  
**Sent:** Tuesday, February 13, 2018 8:39 AM  
**To:** Will Hupman  
**Subject:** RE: meeting request with Bill Wehrum -- March 6th

Hi Will,

It looks like we could fit this in for 45 minutes on Tuesday, March 6 at 1:00pm.

As of today Bill Wehrum's recusal statement for meetings with former clients has not been finalized and in the event it is not in place prior to your meeting, we would delegate this meeting to Bill's deputy Mandy Gunasekara. Other senior air staff also plan to participate in this meeting.

Please advise if the proposed date and time could work on your end.

Emily

Emily Atkinson  
Management Analyst/Office Manager  
Immediate Office of the Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5412B, 1200 Pennsylvania Avenue NW  
Washington, DC 20460  
Voice: 202-564-1850  
Email: [atkinson.emily@epa.gov](mailto:atkinson.emily@epa.gov)

---

**From:** Will Hupman [<mailto:HupmanW@api.org>]  
**Sent:** Wednesday, February 07, 2018 12:57 PM  
**To:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>  
**Subject:** meeting request with Bill Wehrum -- March 6th

Hi Emily – I hope you're staying dry on this rainy Wednesday. I'm reaching out to request a meeting with Assistant Administrator Wehrum on Tuesday, March 6<sup>th</sup> on behalf of the top refining and fuels executives from Chevron, ExxonMobil, Marathon Petroleum, and BP (*listed below*). If possible, the executives would very much like to meet with Mr. Wehrum to discuss issues surrounding the Renewable Fuel Standard. We will of course work around his schedule. Could you let me know if Mr. Wehrum may be available for a meeting on March 6<sup>th</sup> and what other information you may need on our end? I would expect roughly 12 folks in attendance in total. Thank you for the consideration, Emily. Will Hupman

Attendees

Dale Walsh – President, Chevron Products Americas

Dave Brownell – Senior Vice President, Global Operations, ExxonMobil Fuels & Lubricants

Don Templin – President, Marathon Petroleum Corporation

Doug Sparkman – Chief Operating Officer, Fuels, North America, BP

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Will Hupman  
Director - Federal Relations | American Petroleum Institute  
desk: 202-682-8396 | cell: 202-615-7192 | [hupmanw@api.org](mailto:hupmanw@api.org)





## Message

**From:** Dominguez, Alexander [dominguez.alexander@epa.gov]  
**Sent:** 2/23/2018 9:05:03 PM  
**To:** Franklin, Charles [CFranklin@cement.org]  
**CC:** Atkinson, Emily [Atkinson.Emily@epa.gov]; Letendre, Daisy [letendre.daisy@epa.gov]  
**Subject:** RE: Portland Cement Association Meeting Request with Bill Wehrum

Charles,

Due to recusal issues for Bill this meeting has been delegated to Mandy Gunasekara and Clint Woods. I'm happy to set something up for you. The morning of Friday, March 16<sup>th</sup> is currently available if you could do 10:00 or 11:00. Let me know if either of those would work.

Best,  
 Alex

**Alex Dominguez**  
 Policy Analyst to the Principal Deputy  
 Office of Air and Radiation  
 U.S. Environmental Protection Agency

---

**From:** Franklin, Charles [mailto:CFranklin@cement.org]  
**Sent:** Friday, February 23, 2018 4:01 PM  
**To:** Letendre, Daisy ; Atkinson, Emily  
**Cc:** Dominguez, Alexander  
**Subject:** RE: Portland Cement Association Meeting Request with Bill Wehrum

Thank you so much, Daisy. Emily, please let me know what I can provide to help you with this request.

Sincerely,



Charles L. Franklin  
 Vice President and Counsel, Government Affairs  
 Portland Cement Association  
 t. 202.719.1977 c. 202.297.4420  
 e. [cfranklin@cement.org](mailto:cfranklin@cement.org) w. [cement.org](http://cement.org)

---

**From:** Letendre, Daisy [mailto:letendre.daisy@epa.gov]  
**Sent:** Friday, February 23, 2018 11:20 AM  
**To:** Atkinson, Emily <Atkinson.Emily@epa.gov>  
**Cc:** Dominguez, Alexander <dominguez.alexander@epa.gov>; Franklin, Charles <CFranklin@cement.org>  
**Subject:** Portland Cement Association Meeting Request with Bill Wehrum

Emily - pleased find the attached letter requesting a meeting with Bill Wehrum from Charles Franklin at Portland Cement. I work with Charles and PCA in my role with the Smart Sectors program but believe a meeting with Bill and PCA would be very productive.

I've cc'd Charles on this email so that you're able to coordinate directly with him but let me know if I can be of assistance!

Thanks so much,

**Daisy C. Letendre**

*Senior Advisor for Policy and Strategic Communications*

U.S. Environmental Protection Agency

Office of the Administrator

Office of Policy

202.564.0410 (O)

202.603.6231 (C)

Message

---

**From:** Baer, Louis [LBaer@cement.org]  
**Sent:** 4/23/2018 3:09:25 PM  
**To:** DeLuca, Isabel [DeLuca.Isabel@epa.gov]  
**CC:** Atkinson, Emily [Atkinson.Emily@epa.gov]; Franklin, Charles [CFranklin@cement.org]; Derby, Rachel [RDerby@cement.org]  
**Subject:** NACA Fly-In Speaking Confirmation - Bill Wehrum  
**Attachments:** Event Form OAR AA\_NACA\_03282018.docx

Isabel,

We hope you had a great weekend. We are very much looking forward to having Bill Wehrum be our keynote speaker at the NACA Fly-In tomorrow evening, April 24<sup>th</sup>. The event will be held at the Newsuem Rooftop at 555 Pennsylvania Avenue NW on the 8<sup>th</sup> Floor. Mr. Wehrum is scheduled to speak at 6:45 PM. When he arrives, please have him come to the 8<sup>th</sup> Floor. I'm also happy to meet him in the lobby if he prefers. We will have a podium and microphone for him to address our group. After his remarks, there will be a short Q&A session.

Thank you very much for helping to arrange this opportunity to hear Mr. Wehrum speak. It will be very informative and rewarding for our members. If you or Mr. Wehrum need to contact me with help with logistics or anything else tomorrow in preparation for the event, my cell is (314) 922-8041. We are looking forward to tomorrow.

Best,  
Louis

---

Louis A. Baer, Esq., CPEA  
Director/Assistant Counsel, Government Affairs  
Portland Cement Association  
1150 Connecticut Avenue NW, Suite 500  
Office: 202-719-1981  
Cell: 314-922-8041  
[lbaer@cement.org](mailto:lbaer@cement.org)  
[www.cement.org](http://www.cement.org)

Event Information Form
------------------------

This form has been designed to assist in planning participation in events and activities.  
This is not a confirmation of attendance.

### Basic Background

Name of Event	Second Annual Cement and Concrete Fly-In
Sponsoring Organization	North American Concrete Alliance (NACA)
Date of Event	April 24, 2018
Time of Event	6:45 PM
Expected time of remarks or participation by EPA official	20-30 Minutes
Location (please include city/town and street address)	Newseum Rooftop, 555 Pennsylvania Avenue NW
Directions to the event (if appropriate, please also include relevant information about parking, the specific building, and best entrance to use)	<u>Directions and Parking</u>
Where to meet POC	Lobby

### Event Description and Role of the EPA official

Brief description or outline of the event	Keynote Speech for Second Annual Cement and Concrete Fly-In
Brochure, invitation and/or other event material(s)	<a href="http://www.cement.org/flyin">http://www.cement.org/flyin</a>
Agenda and order of speakers and biography/information of other speakers	Discuss priorities for the Office of Air & Radiation
Name of person introducing EPA official	John Stull, CEO, LafargeHolcim (PCA Government Affairs Council Chair) or Dan Nugent, Senior Vice President, Technical Services & Government Affairs (E&E Committee Chair)
Basic information about the role of the EPA official at the event. (For example, will they serve as a keynote speaker? Participate on a panel? Take part in a press conference? Tour a facility?)	Keynote speaker
If the EPA official is a featured speaker, which topic(s) should they address and how long?	Please address Mr. Wehrum's priorities for the Office of Air & Radiation and issues that specifically impact the cement industry, including NSR Reform, Ozone NAAQS implementation and potential reconsideration and RTR reform. Also, please discuss the Clean Power Plan as it could impact the cement industry in the future.
What rules would the audience like to hear about?	Ozone NAAQS, Clean Power Plan, NSR Reform, RTR Reform
Will there be time for Q&A? If so, who will be moderating?	Yes, 15-20 minutes for Q&A.
Do you have a sense of the types of questions that may be asked?	Questions on Ozone NAAQS, Clean Power Plan, NSR Reform and priorities at Office of Air & Radiation

Recommendations on the use of visuals/PowerPoint. Should the EPA official plan on using a PowerPoint Presentation?	There is no need for a PowerPoint presentation
What is the physical layout of the room (e.g. size, and format of the interaction; podium, seated in armchair dialogue, or at a table, etc.)	Podium facing the audience in large banquet room

### About the Audience

Please tell us about the make-up of the audience for the event:	Cement and concrete industry CEOs, member government affairs leaders and member environmental and occupational health and safety leaders.
Expected number in attendance at the event	100
Will it be largely members of your organization?	Yes
Will others be in attendance? If so, who will be at the event? (General public, Businesspeople, Educators, Families, Students – what grade level, Children – how old)	No, event is closed to the public
Others? (Please describe)	There will be a professional photographer who will want to take your picture after Mr. Wehrum's remarks. We can also coordinate on submitting a press release for his remarks.
Is the event open to press?	Event is closed to the press

### Contact Information

Your name:	Louis Baer
Telephone Number:	202-719-1981
Mailing Address:	1150 Connecticut Avenue NW Suite 500 Washington, DC 20036
E-Mail Address:	lbaer@cement.org
Cell Phone Number:	314-922-8041
Fax Number:	
Best way to reach you at the event?	Cell

### EPA Contact Person

Emily Atkinson, Administrative Speech Coordinator: 202-564-1850

John Millett, Communications Director: 202-564-2903

Message

---

**From:** Franklin, Charles [CFranklin@cement.org]  
**Sent:** 2/23/2018 9:01:03 PM  
**To:** Letendre, Daisy [letendre.daisy@epa.gov]; Atkinson, Emily [Atkinson.Emily@epa.gov]  
**CC:** Dominguez, Alexander [dominguez.alexander@epa.gov]  
**Subject:** RE: Portland Cement Association Meeting Request with Bill Wehrum

Thank you so much, Daisy. Emily, please let me know what I can provide to help you with this request.

Sincerely,



**Charles L. Franklin**  
Vice President and Counsel, Government Affairs  
Portland Cement Association  
t. 202.719.1977 c. 202.297.4420  
e. [cfranklin@cement.org](mailto:cfranklin@cement.org) w. [cement.org](http://cement.org)

---

**From:** Letendre, Daisy [mailto:letendre.daisy@epa.gov]  
**Sent:** Friday, February 23, 2018 11:20 AM  
**To:** Atkinson, Emily  
**Cc:** Dominguez, Alexander ; Franklin, Charles  
**Subject:** Portland Cement Association Meeting Request with Bill Wehrum

Emily – pleased find the attached letter requesting a meeting with Bill Wehrum from Charles Franklin at Portland Cement. I work with Charles and PCA in my role with the Smart Sectors program but believe a meeting with Bill and PCA would be very productive.

I've cc'd Charles on this email so that you're able to coordinate directly with him but let me know if I can be of assistance!

Thanks so much,

**Daisy C. Letendre**  
*Senior Advisor for Policy and Strategic Communications*  
U.S. Environmental Protection Agency  
Office of the Administrator  
Office of Policy  
202.564.0410 (O)  
202.603.6231 (C)

Message

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**From:** Baer, Louis [LBaer@cement.org]  
**Sent:** 3/14/2018 2:08:46 PM  
**To:** DeLuca, Isabel [DeLuca.Isabel@epa.gov]  
**CC:** Atkinson, Emily [Atkinson.Emily@epa.gov]; Millett, John [Millett.John@epa.gov]; Franklin, Charles [CFranklin@cement.org]  
**Subject:** RE: Speaking Request during NACA Fly-In

Ms. DeLuca,

Thank you for letting us know. We look forward to hearing from you about Mr. Wehrum's response.

Best,  
Louis

---

Louis A. Baer, Esq., CPEA  
Director/Assistant Counsel, Government Affairs  
Portland Cement Association  
1150 Connecticut Avenue NW, Suite 500  
Office: 202-719-1981  
Cell: 314-922-8041  
[lbaer@cement.org](mailto:lbaer@cement.org)  
[www.cement.org](http://www.cement.org)

---

**From:** DeLuca, Isabel [mailto:DeLuca.Isabel@epa.gov]  
**Sent:** Monday, March 12, 2018 12:12 PM  
**To:** Baer, Louis <LBaer@cement.org>  
**Cc:** Atkinson, Emily <Atkinson.Emily@epa.gov>; Millett, John <Millett.John@epa.gov>  
**Subject:** FW: Speaking Request during NACA Fly-In

Dear Mr. Baer,

Many thanks for the invitation to Bill Wehrum to speak at the NACA fly-in on April 24, and apologies for the delayed response. This is on Bill's list of pending invitations. We're taking a look at his scheduling and travel during that time and we hope to be able to let you know about this very soon.

Best wishes,

Isabel DeLuca  
Deputy Director of Communications  
Office of Air and Radiation, US EPA  
(202) 343-9247

---

**From:** Baer, Louis [mailto:LBaer@cement.org]  
**Sent:** Monday, February 26, 2018 5:21 PM  
**To:** Atkinson, Emily <Atkinson.Emily@epa.gov>  
**Cc:** Franklin, Charles <CFranklin@cement.org>; Derby, Rachel <RDerby@cement.org>; Johnston, A. Todd

<atjohnston@cement.org>; Letendre, Daisy <letendre.daisy@epa.gov>

**Subject:** Speaking Request during NACA Fly-In

Ms. Atkinson,

On behalf of the North American Concrete Alliance (NACA), we would like to invite Mr. Wehrum to be the evening keynote speaker during our Second Annual Cement and Concrete Washington, D.C. Fly-In. The event will take place on April 24, 2018 at the Newseum Rooftop (555 Pennsylvania Avenue NW) from 7-9 PM and Mr. Wehrum is invited to speak anytime during the dinner. The invitation to Mr. Wehrum to be the keynote speaker is attached.

Please let us know if Mr. Wehrum is available to speak during the NACA Fly-In. We look forward to hearing from you. Thank you very much for your help.

Best,  
Louis

---

Louis A. Baer, Esq., CPEA  
Director/Assistant Counsel, Government Affairs  
Portland Cement Association  
1150 Connecticut Avenue NW, Suite 500  
Office: 202-719-1981  
Cell: 314-922-8041  
[lbaer@cement.org](mailto:lbaer@cement.org)  
[www.cement.org](http://www.cement.org)



Message

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**From:** Baer, Louis [LBaer@cement.org]  
**Sent:** 3/19/2018 8:56:29 PM  
**To:** DeLuca, Isabel [DeLuca.Isabel@epa.gov]  
**CC:** Atkinson, Emily [Atkinson.Emily@epa.gov]; Millett, John [Millett.John@epa.gov]; Franklin, Charles [CFranklin@cement.org]  
**Subject:** RE: Speaking Request during NACA Fly-In

Thank you very much for letting us know. We look forward to hearing from you.

---

Louis A. Baer, Esq., CPEA  
Director/Assistant Counsel, Government Affairs  
Portland Cement Association  
1150 Connecticut Avenue NW, Suite 500  
Office: 202-719-1981  
Cell: 314-922-8041  
[lbaer@cement.org](mailto:lbaer@cement.org)  
[www.cement.org](http://www.cement.org)

---

**From:** DeLuca, Isabel [mailto:DeLuca.Isabel@epa.gov]  
**Sent:** Monday, March 19, 2018 4:35 PM  
**To:** Baer, Louis <LBaer@cement.org>  
**Cc:** Atkinson, Emily <Atkinson.Emily@epa.gov>; Millett, John <Millett.John@epa.gov>; Franklin, Charles <CFranklin@cement.org>  
**Subject:** RE: Speaking Request during NACA Fly-In

Hi Louis,

Thank you for your patience, and apologies for keeping you hanging ---it is taking a while to firm up Bill's schedule. I hope to be able to let you know very soon.

Thanks again,  
Isabel

**Isabel DeLuca**  
Deputy Director of Communications  
Office of Air and Radiation, US EPA  
(202) 343-9247

---

**From:** Baer, Louis [mailto:LBaer@cement.org]  
**Sent:** Monday, March 19, 2018 3:43 PM  
**To:** DeLuca, Isabel <DeLuca.Isabel@epa.gov>  
**Cc:** Atkinson, Emily <Atkinson.Emily@epa.gov>; Millett, John <Millett.John@epa.gov>; Franklin, Charles <CFranklin@cement.org>  
**Subject:** RE: Speaking Request during NACA Fly-In

Ms. DeLuca,

I wanted to follow up and see if you had been able to determine whether Mr. Wehrum is available to speak at the NACA Fly-In during the evening of April 24. Thank you very much. We look forward to hearing from you.

Best,

Louis

---

Louis A. Baer, Esq., CPEA  
Director/Assistant Counsel, Government Affairs  
Portland Cement Association  
1150 Connecticut Avenue NW, Suite 500  
Office: 202-719-1981  
Cell: 314-922-8041  
[lbaer@cement.org](mailto:lbaer@cement.org)  
[www.cement.org](http://www.cement.org)

---

**From:** DeLuca, Isabel [<mailto:DeLuca.Isabel@epa.gov>]  
**Sent:** Monday, March 12, 2018 12:12 PM  
**To:** Baer, Louis <[LBaer@cement.org](mailto:LBaer@cement.org)>  
**Cc:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>; Millett, John <[Millett.John@epa.gov](mailto:Millett.John@epa.gov)>  
**Subject:** FW: Speaking Request during NACA Fly-In

Dear Mr. Baer,

Many thanks for the invitation to Bill Wehrum to speak at the NACA fly-in on April 24, and apologies for the delayed response. This is on Bill's list of pending invitations. We're taking a look at his scheduling and travel during that time and we hope to be able to let you know about this very soon.

Best wishes,

Isabel DeLuca  
Deputy Director of Communications  
Office of Air and Radiation, US EPA  
(202) 343-9247

---

**From:** Baer, Louis [<mailto:LBaer@cement.org>]  
**Sent:** Monday, February 26, 2018 5:21 PM  
**To:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>  
**Cc:** Franklin, Charles <[CFranklin@cement.org](mailto:CFranklin@cement.org)>; Derby, Rachel <[RDerby@cement.org](mailto:RDerby@cement.org)>; Johnston, A. Todd <[atjohnston@cement.org](mailto:atjohnston@cement.org)>; Letendre, Daisy <[letendre.daisy@epa.gov](mailto:letendre.daisy@epa.gov)>  
**Subject:** Speaking Request during NACA Fly-In

Ms. Atkinson,

On behalf of the North American Concrete Alliance (NACA), we would like to invite Mr. Wehrum to be the evening keynote speaker during our Second Annual Cement and Concrete Washington, D.C. Fly-In. The event will take place on April 24, 2018 at the Newseum Rooftop (555 Pennsylvania Avenue NW) from 7-9 PM and Mr. Wehrum is invited to speak anytime during the dinner. The invitation to Mr. Wehrum to be the keynote speaker is attached.

Please let us know if Mr. Wehrum is available to speak during the NACA Fly-In. We look forward to hearing from you. Thank you very much for your help.

Best,  
Louis

---

Louis A. Baer, Esq., CPEA  
Director/Assistant Counsel, Government Affairs  
Portland Cement Association  
1150 Connecticut Avenue NW, Suite 500  
Office: 202-719-1981  
Cell: 314-922-8041  
[lbaer@cement.org](mailto:lbaer@cement.org)  
[www.cement.org](http://www.cement.org)

Message

---

**From:** Dominguez, Alexander [dominguez.alexander@epa.gov]  
**Sent:** 1/17/2018 6:25:02 PM  
**To:** Hutchins, Thomas D (Tom) [Thomas\_Hutchins@kindermorgan.com]  
**Subject:** RE: EPA Meeting Request

Thank you for the quick response. I have put that time on hold for you until confirmation.

-----Original Message-----

From: Hutchins, Thomas D (Tom) [mailto:Thomas\_Hutchins@kindermorgan.com]  
Sent: Wednesday, January 17, 2018 1:19 PM  
To: Dominguez, Alexander <dominguez.alexander@epa.gov>  
Cc: Harlow, David <harlow.david@epa.gov>  
Subject: Re: EPA Meeting Request

Alex,

Thank you for the email and proposed dates and times.

Monday will not work, but Tuesday at 9:30 am should work.

Please allow me to confirm Tuesday will work. I will confirm the date & time with you later this week.

Sent from my iPhone  
Thomas D. Hutchins  
713-420-7918 Office  
713-705-0683 Cell  
Thomas\_hutchins@kindermorgan.com<mailto:Thomas\_hutchins@kindermorgan.com>

On Jan 17, 2018, at 11:50 AM, Dominguez, Alexander  
<dominguez.alexander@epa.gov<mailto:dominguez.alexander@epa.gov>> wrote:

[This email message was received from the Internet and came from outside of Kinder Morgan]

Hey Tom,

I have taken over Mandy's scheduling for the time being and happy to set something up.

Would you be available Monday, February 12th at 10:00AM or Tuesday (02/13) at 9:30AM?

Best,  
Alex

Alex Dominguez  
Policy Analyst to the Principal Deputy  
Office of Air and Radiation  
U.S. Environmental Protection Agency

-----Original Message-----

From: Hutchins, Thomas D (Tom) [mailto:Thomas\_Hutchins@kindermorgan.com]  
Sent: Friday, January 12, 2018 10:41 PM  
To: Atkinson, Emily <Atkinson.Emily@epa.gov<mailto:Atkinson.Emily@epa.gov>>  
Cc: Harlow, David <harlow.david@epa.gov<mailto:harlow.david@epa.gov>>  
Subject: FW: Follow Up on Meeting with Administrator Pruitt

Emily,

This time with the correct email address.

Employee Observations - It's not a gotcha - it's "I've got your back!"

Driving Continuous Improvements in People Safety and the Environment; Air Quality, Environmental Compliance and Remediation.

Thomas D. Hutchins, PE

EH&S VP

Kinder Morgan Natural Gas Pipelines

713-420-7918 - Office

713-445-9272 - Fax

713-705-0683 - Cell

Thomas\_hutchins@kindermorgan.com<mailto:Thomas\_hutchins@kindermorgan.com>

Call 811 before you dig!

-----Original Message-----

From: Hutchins, Thomas D (Tom)

Sent: Friday, January 12, 2018 9:33 PM

To: 'Harlow, David'

Cc: 'emily.atkinson@epa.gov<mailto:emily.atkinson@epa.gov>'

Subject: RE: Follow Up on Meeting with Administrator Pruitt

David,

## Personal Matters / Ex. 6

Concerning the topics for the follow up meeting, they are:

1. 0000a;
2. Start up, Shut down and Malfunction SIP Emissions; and,
3. Once In Always In Policy.

Is there anything else you or Mandy would want to discuss? What EPA representatives would you envision participating in the meeting?

A meeting the week of Feb 5 or 12 would work for us.

I look forward to hearing back from Emily on the potential meeting dates?

Employee Observations - It's not a gotcha - it's "I've got your back!"

Driving Continuous Improvements in People Safety and the Environment; Air Quality, Environmental Compliance and Remediation.

Thomas D. Hutchins, PE

EH&S VP

Kinder Morgan Natural Gas Pipelines

713-420-7918 - Office

713-445-9272 - Fax

713-705-0683 - Cell

Thomas\_hutchins@kindermorgan.com<mailto:Thomas\_hutchins@kindermorgan.com>

Call 811 before you dig!

-----Original Message-----

From: Harlow, David [mailto:harlow.david@epa.gov]

Sent: Monday, January 08, 2018 9:03 AM

To: Hutchins, Thomas D (Tom)

Subject: Re: Follow Up on Meeting with Administrator Pruitt

[This email message was received from the Internet and came from outside of Kinder Morgan]

## Personal Matters / Ex. 6

Sent from my iPhone

> On Jan 8, 2018, at 9:56 AM, Hutchins, Thomas D (Tom)  
<Thomas\_Hutchins@kindermorgan.com<mailto:Thomas\_Hutchins@kindermorgan.com>> wrote:

>

> David,

>

> Thank you for the email, Emily's contact information and specific topics for discussion.

>

## Personal Matters / Ex. 6

>

> It will be later this week before I follow up with Emily.

>

> Sent from my iPhone

> Thomas D. Hutchins

> 713-420-7918 Office

> 713-705-0683 Cell

>

Thomas\_hutchins@kindermorgan.com<mailto:Thomas\_hutchins@kindermorgan.c<mailto:Thomas\_hutchins@kindermorgan.com%3cmailto:Thomas\_hutchins@kindermorgan.c>

> om>

>

> On Jan 8, 2018, at 8:18 AM, Harlow, David  
<harlow.david@epa.gov<mailto:harlow.david@epa.gov<mailto:harlow.david@epa.gov%3cmailto:harlow.david@epa.gov>>> wrote:

>

> [This email message was received from the Internet and came from

> outside of Kinder Morgan]

>

>

> Tom,

>

> To close the loop on this, if you or your people there would be so good as to contact Emily Atkinson, whom I am cc'ing on this email, to initiate a "formal" request, as it were, for a meeting, Emily will be happy to work with you to arrange for a suitable date and time. (While I think email would work best all around, I believe her office number is Personal Phone / Ex. 6).

>

> Based on your having mentioned your wish to follow up on some of the matters discussed with the Administrator back on December 7, my assumption is that top of the agenda would be NSPS 0000a. If you all should have any other/additional air-related topics to discuss, please let Emily know, so that she/we can arrange to have the right people from our end available (e.g., program staff) to participate, in addition to Mandy and me.

>

> Thank you.

>

> David S. Harlow

> Senior Counsel

> Immediate Office of the Assistant Administrator Office of Air and

> Radiation, USEPA WJC-N Room 5409K

> 1200 Pennsylvania Avenue NW

> Washington, DC 20460

> 202-564-1233

>

Harlow.David@epa.gov<mailto:Harlow.David@epa.gov<mailto:Harlow.David@epa.gov%3cmailto:Harlow.David@epa.gov>>>

>

> -----Original Message-----

> From: Harlow, David  
> Sent: Friday, January 5, 2018 8:08 PM  
> To: Hutchins, Thomas D (Tom)  
>  
> <Thomas\_Hutchins@kindermorgan.commailto:Thomas\_Hutchins@kindermorgan.commailto:Thomas\_Hutchins@kindermorgan.com>  
> com>>  
> Subject: Re: Follow Up on Meeting with Administrator Pruitt  
>  
> Tom,  
>  
> Please accept my apologies for taking so long to get back to you. I'm afraid I let the afternoon get away from me.  
>  
> I'd be delighted to have a follow up meeting to discuss those matters  
> that were at issue when you and your colleagues were here meeting with  
> the Administrator, Samantha, and me on December 8. As you will recall,  
> Bill himself was recused from participating in that meeting due to his  
> prior representation of your company. As this remains the case, I  
> would propose that Mandy Gunasekara, our Principal Deputy Assistant  
> Administrator, participate this time around. (She would have done so  
> last month, of course, but was on travel that particular day.)  
>  
> The best way to proceed, I think, is for you to get in contact with Emily Atkinson, the Office Manager for the OAR "immediate office." She oversees the scheduling for those of us here. I will get back in touch with you on Monday, via email, with some contact information for Emily. She'll be able to help us find a mutually convenient date to schedule a meeting.  
>  
> I look forward to seeing you again in the near future.  
>  
> Sent from my iPhone  
>  
> On Jan 5, 2018, at 2:56 PM, Hutchins, Thomas D (Tom)  
> <Thomas\_Hutchins@kindermorgan.commailto:Thomas\_Hutchins@kindermorgan.commailto:Thomas\_Hutchins@kindermorgan.com%3cmmailto:Thomas\_Hutchins@kindermorgan.com>>> wrote:  
>  
> David,  
>  
> I hope you had an enjoyable time welcoming 2018.  
>  
> Is there an opportunity to follow up on some of the topics included in the material provided during the December 7 meeting with you, Samantha and Administrator Pruitt.  
>



> I was reading today about the improvements being made by the permit streamlining team and really appreciate their efforts and accomplishments.

>

> I look forward to hearing from you.

>

> Sent from my iPhone

> Thomas D. Hutchins

> 713-420-7918 Office

> 713-705-0683 Cell

>

Thomas\_hutchins@kindermorgan.com<mailto:Thomas\_hutchins@kindermorgan.c<mailto:Thomas\_hutchins@kindermorgan.com%3cmailto:Thomas\_hutchins@kindermorgan.c>

> om><mailto:Thomas\_hutchins@kindermorgan.com>

>

## Message

**From:** Atkinson, Emily [Atkinson.Emily@epa.gov]  
**Sent:** 1/17/2018 4:42:05 PM  
**To:** Dominguez, Alexander [dominguez.alexander@epa.gov]  
**Subject:** RE: Follow Up on Meeting with Administrator Pruitt

**Flag:** Follow up

So if he wants OAQPS then I would start with just adding in Mike Koerber, Anna Wood, Peter Tsirigotis and Pete South. I think Clint is also involved in this so he could be a cc.

Thanks Alex!

---

**From:** Dominguez, Alexander  
**Sent:** Wednesday, January 17, 2018 11:39 AM  
**To:** Atkinson, Emily <Atkinson.Emily@epa.gov>  
**Subject:** FW: Follow Up on Meeting with Administrator Pruitt

Is it okay for me to set up at this point or you generally wait for him to give you names of OAQPS staff?

---

**From:** Harlow, David  
**Sent:** Tuesday, January 16, 2018 11:44 PM  
**To:** Atkinson, Emily <Atkinson.Emily@epa.gov>  
**Cc:** Gunasekara, Mandy <Gunasekara.Mandy@epa.gov>; Dominguez, Alexander <dominguez.alexander@epa.gov>  
**Subject:** Re: Follow Up on Meeting with Administrator Pruitt

Emily,

Yes, I think relevant staff should attend. These issues -- "once in/always in," OOOOa, and SSM, are all OAQPS issues. Will follow up with specific names later.

Forty-five minutes is fine.

Thank you.

Sent from my iPhone

On Jan 16, 2018, at 10:04 AM, Atkinson, Emily <Atkinson.Emily@epa.gov> wrote:

David and Mandy - please advise if this is a meeting you want to take alone or if you want staff to join you (and if so, please provide the names or at least the offices you want represented). The list of topics he wants to cover is highlighted below. And is 45 minutes enough time?

-----Original Message-----

**From:** Hutchins, Thomas D (Tom) [mailto:Thomas\_Hutchins@kindermorgan.com]  
**Sent:** Friday, January 12, 2018 10:41 PM  
**To:** Atkinson, Emily <Atkinson.Emily@epa.gov>  
**Cc:** Harlow, David <harlow.david@epa.gov>  
**Subject:** FW: Follow Up on Meeting with Administrator Pruitt

Emily,

This time with the correct email address.

Employee Observations - It's not a gotcha - it's "I've got your back!"

Driving Continuous Improvements in People Safety and the Environment; Air Quality, Environmental Compliance and Remediation.

Thomas D. Hutchins, PE

EH&S VP

Kinder Morgan Natural Gas Pipelines

713-420-7918 - Office

713-445-9272 - Fax

713-705-0683 - Cell

Thomas\_hutchins@kindermorgan.com

Call 811 before you dig!

-----Original Message-----

From: Hutchins, Thomas D (Tom)

Sent: Friday, January 12, 2018 9:33 PM

To: 'Harlow, David'

Cc: 'emily.atkinson@epa.gov'

Subject: RE: Follow Up on Meeting with Administrator Pruitt

David,

## Personal Matters / Ex. 6

Concerning the topics for the follow up meeting, they are:

1. OOOOa;
2. Start up, Shut down and Malfunction SIP Emissions; and,
3. Once In Always In Policy.

Is there anything else you or Mandy would want to discuss? What EPA representatives would you envision participating in the meeting?

A meeting the week of Feb 5 or 12 would work for us.

I look forward to hearing back from Emily on the potential meeting dates?

Employee Observations - It's not a gotcha - it's "I've got your back!"

Driving Continuous Improvements in People Safety and the Environment; Air Quality, Environmental Compliance and Remediation.

Thomas D. Hutchins, PE

EH&S VP

Kinder Morgan Natural Gas Pipelines

713-420-7918 - Office

713-445-9272 - Fax

713-705-0683 - Cell

Thomas\_hutchins@kindermorgan.com

Call 811 before you dig!

-----Original Message-----

From: Harlow, David [mailto:harlow.david@epa.gov]

Sent: Monday, January 08, 2018 9:03 AM

To: Hutchins, Thomas D (Tom)

Subject: Re: Follow Up on Meeting with Administrator Pruitt

[This email message was received from the Internet and came from outside of Kinder Morgan]

## Personal Matters / Ex. 6

Sent from my iPhone

> On Jan 8, 2018, at 9:56 AM, Hutchins, Thomas D (Tom)

<Thomas\_Hutchins@kindermorgan.com> wrote:

>

> David,

>

> Thank you for the email, Emily's contact information and specific topics for discussion.

>

## Personal Matters / Ex. 6

>

> It will be later this week before I follow up with Emily.

>

> Sent from my iPhone

> Thomas D. Hutchins

> 713-420-7918 Office

> 713-705-0683 Cell

> Thomas\_hutchins@kindermorgan.com<mailto:Thomas\_hutchins@kindermorgan.c

> om>

>

> On Jan 8, 2018, at 8:18 AM, Harlow, David

<harlow.david@epa.gov<mailto:harlow.david@epa.gov>> wrote:

>

> [This email message was received from the Internet and came from

> outside of Kinder Morgan]

>

>

> Tom,

>

> To close the loop on this, if you or your people there would be so good as to contact Emily Atkinson, whom I am cc'ing on this email, to initiate a "formal" request, as it were, for a meeting, Emily will be happy to work with you to arrange for a suitable date and time. (While I think email would work best all around, I believe her office number is

Personal Phone / Ex. 6

>  
 > Based on your having mentioned your wish to follow up on some of the matters discussed with the Administrator back on December 7, my assumption is that top of the agenda would be NSPS OOOOa. If you all should have any other/additional air-related topics to discuss, please let Emily know, so that she/we can arrange to have the right people from our end available (e.g., program staff) to participate, in addition to Mandy and me.

>  
 > Thank you.

>  
 > David S. Harlow  
 > Senior Counsel  
 > Immediate Office of the Assistant Administrator Office of Air and  
 > Radiation, USEPA WJC-N Room 5409K  
 > 1200 Pennsylvania Avenue NW  
 > Washington, DC 20460  
 > 202-564-1233  
 > Harlow.David@epa.gov<mailto:Harlow.David@epa.gov>

> -----Original Message-----

> From: Harlow, David  
 > Sent: Friday, January 5, 2018 8:08 PM  
 > To: Hutchins, Thomas D (Tom)  
 > <[Thomas\\_Hutchins@kindermorgan.com](mailto:Thomas_Hutchins@kindermorgan.com)<mailto:Thomas\_Hutchins@kindermorgan.com>>  
 > Subject: Re: Follow Up on Meeting with Administrator Pruitt

> Tom,

> Please accept my apologies for taking so long to get back to you. I'm afraid I let the afternoon get away from me.

> I'd be delighted to have a follow up meeting to discuss those matters  
 > that were at issue when you and your colleagues were here meeting with  
 > the Administrator, Samantha, and me on December 8. As you will recall,  
 > Bill himself was recused from participating in that meeting due to his  
 > prior representation of your company. As this remains the case, I  
 > would propose that Mandy Gunasekara, our Principal Deputy Assistant  
 > Administrator, participate this time around. (She would have done so  
 > last month, of course, but was on travel that particular day.)

> The best way to proceed, I think, is for you to get in contact with Emily Atkinson, the Office Manager for the OAR "immediate office." She oversees the scheduling for those of us here. I will get back in touch with you on Monday, via email, with some contact information for Emily. She'll be able to help us find a mutually convenient date to schedule a meeting.

> I look forward to seeing you again in the near future.

> Sent from my iPhone

> On Jan 5, 2018, at 2:56 PM, Hutchins, Thomas D (Tom)  
 <[Thomas\\_Hutchins@kindermorgan.com](mailto:Thomas_Hutchins@kindermorgan.com)<mailto:Thomas\_Hutchins@kindermorgan.com>>  
 wrote:

>  
> David,  
>  
> I hope you had an enjoyable time welcoming 2018.  
>  
> Is there an opportunity to follow up on some of the topics included in the material provided during the December 7 meeting with you, Samantha and Administrator Pruitt.  
>  
> I was reading today about the improvements being made by the permit streamlining team and really appreciate their efforts and accomplishments.  
>  
> I look forward to hearing from you.  
>  
> Sent from my iPhone  
> Thomas D. Hutchins  
> 713-420-7918 Office  
> 713-705-0683 Cell  
> Thomas\_hutchins@kindermorgan.com<mailto:Thomas\_hutchins@kindermorgan.c  
> om><mailto:Thomas\_hutchins@kindermorgan.com>  
>

Message

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**From:** Atkinson, Emily [Atkinson.Emily@epa.gov]  
**Sent:** 2/13/2018 1:39:12 PM  
**To:** HupmanW@api.org  
**Subject:** RE: meeting request with Bill Wehrum -- March 6th

Hi Will,

It looks like we could fit this in for 45 minutes on Tuesday, March 6 at 1:00pm.

As of today Bill Wehrum's recusal statement for meetings with former clients has not been finalized and in the event it is not in place prior to your meeting, we would delegate this meeting to Bill's deputy Mandy Gunasekara. Other senior air staff also plan to participate in this meeting.

Please advise if the proposed date and time could work on your end.

Emily

Emily Atkinson  
 Management Analyst/Office Manager  
 Immediate Office of the Assistant Administrator  
 Office of Air and Radiation, USEPA  
 Room 5412B, 1200 Pennsylvania Avenue NW  
 Washington, DC 20460  
 Voice: 202-564-1850  
 Email: [atkinson.emily@epa.gov](mailto:atkinson.emily@epa.gov)

---

**From:** Will Hupman [<mailto:HupmanW@api.org>]  
**Sent:** Wednesday, February 07, 2018 12:57 PM  
**To:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>  
**Subject:** meeting request with Bill Wehrum -- March 6th

Hi Emily – I hope you're staying dry on this rainy Wednesday. I'm reaching out to request a meeting with Assistant Administrator Wehrum on Tuesday, March 6<sup>th</sup> on behalf of the top refining and fuels executives from Chevron, ExxonMobil, Marathon Petroleum, and BP (*listed below*). If possible, the executives would very much like to meet with Mr. Wehrum to discuss issues surrounding the Renewable Fuel Standard. We will of course work around his schedule. Could you let me know if Mr. Wehrum may be available for a meeting on March 6<sup>th</sup> and what other information you may need on our end? I would expect roughly 12 folks in attendance in total. Thank you for the consideration, Emily. Will Hupman

Attendees

Dale Walsh – President, Chevron Products Americas  
 Dave Brownell – Senior Vice President, Global Operations, ExxonMobil Fuels & Lubricants  
 Don Templin – President, Marathon Petroleum Corporation  
 Doug Sparkman – Chief Operating Officer, Fuels, North America, BP

**Will Hupman**

Director - Federal Relations | American Petroleum Institute  
desk: 202-682-8396 | cell: 202-615-7192 | hupmanw@api.org





America's Cement Manufacturers™

Portland Cement Association  
1150 Connecticut Avenue, NW, Suite 500  
Washington, DC 20036-4104  
202.462.9404 Fax 202.462.0877  
www.cement.org

February 9, 2018

Daisy Letendre  
Senior Advisor for Policy and Strategic Communications  
Office of the Administrator  
Office of Policy (MC-1804A)  
1200 Pennsylvania Avenue NW

**Re: Request for Meeting with Mr. William L. Wehrum in March or April 2018**

Dear Daisy:

First let me express my appreciation for your tremendous help and responsibility to the cement industry over the last several months. We have found the new Smart Sector program, and you in particular, to be invaluable tools in promoting a constructive dialogue between EPA and our industry on regulatory issues and priorities. To further this dialogue, the Portland Cement Association (PCA) is formally requesting a meeting with Mr. William L. Wehrum, the Assistant Administrator for the Office of Air & Radiation.

PCA is the leading voice for the U.S. cement manufacturing industry. Our members are responsible for more than 92 percent of the portland cement production capacity in the United States, have facilities in all 50 states, and serve nearly every Congressional district. Our mission focuses on improving and expanding the quality and uses of cement and concrete, raising the quality of construction, and contributing to a better environment.

Federal regulatory policy under the Clean Air Act ("CAA") is one of the most significant regulatory drivers for the cement industry, and continued, economically-practicable compliance is a top priority. Our members must comply with a variety of CAA programs, including National Ambient Air Quality Standards, New Source Review, National Emissions Standards for Hazardous Air Pollutants, Regional Haze Standards, and associated permitting programs. The industry is also committed to advancing the sustainability of its facilities and operations.

With this meeting, PCA hopes to initiate a constructive dialogue with Mr. Wehrum and his team regarding the unique issues facing the cement industry, identify barriers to compliance and economic operations, and explore the status of key regulatory proceedings relevant to the cement industry. To the extent practicable with Mr. Wehrum's schedule, we would respectfully request a meeting during the third week of March or the first two weeks of April. PCA attendees would include PCA staff and select leaders from PCA member companies.

Please do not hesitate to contact me at 202-719-1977 or [cfranklin@cement.org](mailto:cfranklin@cement.org) if you would like to discuss this request further. Thank you.

Sincerely,

/S/

Charles L. Franklin  
Vice President & Counsel  
Government Affairs

Message

---

**From:** Dominguez, Alexander [dominguez.alexander@epa.gov]  
**Sent:** 3/1/2018 3:21:48 PM  
**To:** Baer, Louis [LBaer@cement.org]; Franklin, Charles [CFranklin@cement.org]  
**CC:** Atkinson, Emily [Atkinson.Emily@epa.gov]; Letendre, Daisy [letendre.daisy@epa.gov]; Johnston, A. Todd [atjohnston@cement.org]  
**Subject:** RE: Portland Cement Association Meeting Request

Louis,

Confirmed for Thursday, March 22 at 1:00PM.

Directions and procedures to 1200 Pennsylvania Avenue NW:

**Metro:** If you come by Metro get off at the Federal Triangle metro stop. Exit the metro station and go up two sets of escalators to the surface level and turn right. You will see a short staircase and wheelchair ramp leading to a set of glass doors with the EPA logo - that is the William Jefferson Clinton Federal Building, North Entrance.

**Taxi:** Direct the taxi to drop you off on 12th Street NW, between Constitution and Pennsylvania Avenues, at the elevator for the Federal Triangle metro stop - this is almost exactly half way between the two avenues on 12th Street NW. Facing the building with the EPA logo and American flags, walk toward the building and take the glass door on your right hand side with the escalators going down to the metro on your left – that is the North Lobby of the William Jefferson Clinton building.

**Security Procedures:** A government issued photo id is required to enter the building and it is suggested you arrive 15 minutes early in order to be cleared and arrive at the meeting room on time. Upon entering the lobby, the meeting attendees will be asked to pass through security and provide a photo ID for entrance. Let the guards know that you were instructed to call 202-564-7404 for a security escort.

Please send me a list of participants and any materials in advance of the meeting. Feel free to contact me should you need any additional information.

**Alex Dominguez**

Policy Analyst to the Principal Deputy  
 Office of Air and Radiation  
 U.S. Environmental Protection Agency

---

**From:** Baer, Louis [mailto:LBaer@cement.org]  
**Sent:** Thursday, March 1, 2018 10:11 AM  
**To:** Dominguez, Alexander <dominguez.alexander@epa.gov>; Franklin, Charles <CFranklin@cement.org>  
**Cc:** Atkinson, Emily <Atkinson.Emily@epa.gov>; Letendre, Daisy <letendre.daisy@epa.gov>; Johnston, A. Todd <atjohnston@cement.org>  
**Subject:** RE: Portland Cement Association Meeting Request

Alex,

Sorry we got disconnected. We would like to schedule the meeting with Clint, David and Mandy for 1 PM on Thursday March 22. Please feel free to call me back with any questions. We look forward to meeting with them on Thursday March 22.

Best,

Louis

---

Louis A. Baer, Esq., CPEA  
Director/Assistant Counsel, Government Affairs  
Portland Cement Association  
1150 Connecticut Avenue NW, Suite 500  
Office: 202-719-1981  
Cell: 314-922-8041  
[lbaer@cement.org](mailto:lbaer@cement.org)  
[www.cement.org](http://www.cement.org)

---

**From:** Baer, Louis  
**Sent:** Wednesday, February 28, 2018 10:26 AM  
**To:** 'Dominguez, Alexander' <[dominguez.alexander@epa.gov](mailto:dominguez.alexander@epa.gov)>; Franklin, Charles <[CFranklin@cement.org](mailto:CFranklin@cement.org)>  
**Cc:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>; Letendre, Daisy <[letendre.daisy@epa.gov](mailto:letendre.daisy@epa.gov)>; Johnston, A. Todd <[atjohnston@cement.org](mailto:atjohnston@cement.org)>  
**Subject:** RE: Portland Cement Association Meeting Request

Alex,

Thank you for your help in setting up a meeting with Mandy, Clint and other representatives at EPA OAR. To introduce myself, I am the Director/Assistant Counsel at the Portland Cement Association and work with Todd and Charles on environment & energy regulatory affairs issues for PCA. We have spoken with members and we were wondering if OAR senior staff had flexibility in their schedules and were available for a meeting the following week on either Tuesday, March 20, Wednesday, March 21 or Thursday March 22. That would allow for our member leaders to travel to D.C. and join the meeting. It would be our preference to schedule a meeting for Thursday March 22 in the afternoon to maximize member participation but if there is no availability on Thursday, March 22 during the afternoon, please also let us know if there are available times on Tuesday, March 20, Wednesday, March 21, or Thursday, March 22. Thank you much for your flexibility. We look forward to hearing from you.

Best,  
Louis

---

Louis A. Baer, Esq., CPEA  
Director/Assistant Counsel, Government Affairs  
Portland Cement Association  
1150 Connecticut Avenue NW, Suite 500  
Office: 202-719-1981  
Cell: 314-922-8041  
[lbaer@cement.org](mailto:lbaer@cement.org)  
[www.cement.org](http://www.cement.org)

---

**From:** Dominguez, Alexander [<mailto:dominguez.alexander@epa.gov>]  
**Sent:** Tuesday, February 27, 2018 8:30 AM  
**To:** Franklin, Charles <[CFranklin@cement.org](mailto:CFranklin@cement.org)>  
**Cc:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>; Letendre, Daisy <[letendre.daisy@epa.gov](mailto:letendre.daisy@epa.gov)>; Baer, Louis <[LBaer@cement.org](mailto:LBaer@cement.org)>; Johnston, A. Todd <[atjohnston@cement.org](mailto:atjohnston@cement.org)>  
**Subject:** RE: Portland Cement Association Meeting Request

Morning Charles,

You are confirmed for a 45 minute meeting on Friday, March 16<sup>th</sup> at 11:00AM. I will certainly invite David and OAR will be well represented. Please send me a list of participants, discussion items, and any materials in advance of the meeting in order to ensure we have the proper technical staff in the room.

Directions and procedures to 1200 Pennsylvania Avenue NW:

Metro: If you come by Metro get off at the Federal Triangle metro stop. Exit the metro station and go up two sets of escalators to the surface level and turn right. You will see a short staircase and wheelchair ramp leading to a set of glass doors with the EPA logo - that is the William Jefferson Clinton Federal Building, North Entrance.

Taxi: Direct the taxi to drop you off on 12th Street NW, between Constitution and Pennsylvania Avenues, at the elevator for the Federal Triangle metro stop - this is almost exactly half way between the two avenues on 12th Street NW. Facing the building with the EPA logo and American flags, walk toward the building and take the glass door on your right hand side with the escalators going down to the metro on your left – that is the North Lobby of the William Jefferson Clinton building.

Security Procedures: A government issued photo id is required to enter the building and it is suggested you arrive 15 minutes early in order to be cleared and arrive at the meeting room on time. Upon entering the lobby, the meeting attendees will be asked to pass through security and provide a photo ID for entrance. Let the guards know that you were instructed to call 202-564-7404 for a security escort.

Feel free to contact me should you need any additional information.

**Alex Dominguez**

Policy Analyst to the Principal Deputy

Office of Air and Radiation

U.S. Environmental Protection Agency

---

**From:** Franklin, Charles [<mailto:CFranklin@cement.org>]

**Sent:** Monday, February 26, 2018 4:55 PM

**To:** Dominguez, Alexander <[dominguez.alexander@epa.gov](mailto:dominguez.alexander@epa.gov)>

**Cc:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>; Letendre, Daisy <[letendre.daisy@epa.gov](mailto:letendre.daisy@epa.gov)>; Baer, Louis <[LBaer@cement.org](mailto:LBaer@cement.org)>; Johnston, A. Todd <[atjohnston@cement.org](mailto:atjohnston@cement.org)>

**Subject:** RE: Portland Cement Association Meeting Request

Hi Alex:

Thank you for the message. We are disappointed to hear of Bill's recusal but understand and certainly appreciate the opportunity to meet with Mandy and Clint. May we do 11 am on March 16, as suggested? Also, would it be possible to include David Harlow in that meeting?

We are looking forward to introducing PCA's environmental team and sharing information on some of the industry's key environmental policy issues.

Best



Charles L. Franklin  
Vice President and Counsel, Government Affairs  
Portland Cement Association  
t. 202.719.1977 c. 202.297.4420  
e. [cfranklin@cement.org](mailto:cfranklin@cement.org) w. [cement.org](http://cement.org)

---

**From:** Dominguez, Alexander [<mailto:dominguez.alexander@epa.gov>]  
**Sent:** Friday, February 23, 2018 4:05 PM  
**To:** Franklin, Charles <[CFranklin@cement.org](mailto:CFranklin@cement.org)>  
**Cc:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>; Letendre, Daisy <[letendre.daisy@epa.gov](mailto:letendre.daisy@epa.gov)>  
**Subject:** RE: Portland Cement Association Meeting Request with Bill Wehrum

Charles,

Due to recusal issues for Bill this meeting has been delegated to Mandy Gunasekara and Clint Woods. I'm happy to set something up for you. The morning of Friday, March 16<sup>th</sup> is currently available if you could do 10:00 or 11:00. Let me know if either of those would work.

Best,  
Alex

**Alex Dominguez**  
Policy Analyst to the Principal Deputy  
Office of Air and Radiation  
U.S. Environmental Protection Agency

---

**From:** Franklin, Charles [<mailto:CFranklin@cement.org>]  
**Sent:** Friday, February 23, 2018 4:01 PM  
**To:** Letendre, Daisy <[letendre.daisy@epa.gov](mailto:letendre.daisy@epa.gov)>; Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>  
**Cc:** Dominguez, Alexander <[dominguez.alexander@epa.gov](mailto:dominguez.alexander@epa.gov)>  
**Subject:** RE: Portland Cement Association Meeting Request with Bill Wehrum

Thank you so much, Daisy. Emily, please let me know what I can provide to help you with this request.

Sincerely,



Charles L. Franklin  
Vice President and Counsel, Government Affairs  
Portland Cement Association  
t. 202.719.1977 c. 202.297.4420  
e. [cfranklin@cement.org](mailto:cfranklin@cement.org) w. [cement.org](http://cement.org)

---

**From:** Letendre, Daisy [<mailto:letendre.daisy@epa.gov>]  
**Sent:** Friday, February 23, 2018 11:20 AM  
**To:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>  
**Cc:** Dominguez, Alexander <[dominguez.alexander@epa.gov](mailto:dominguez.alexander@epa.gov)>; Franklin, Charles <[CFranklin@cement.org](mailto:CFranklin@cement.org)>  
**Subject:** Portland Cement Association Meeting Request with Bill Wehrum

Emily – pleased find the attached letter requesting a meeting with Bill Wehrum from Charles Franklin at Portland Cement. I work with Charles and PCA in my role with the Smart Sectors program but believe a meeting with Bill and PCA would be very productive.

I've cc'd Charles on this email so that you're able to coordinate directly with him but let me know if I can be of assistance!

Thanks so much,

**Daisy C. Letendre**

*Senior Advisor for Policy and Strategic Communications*

U.S. Environmental Protection Agency

Office of the Administrator

Office of Policy

202.564.0410 (O)

202.603.6231 (C)

Message

---

**From:** DeLuca, Isabel [DeLuca.Isabel@epa.gov]  
**Sent:** 1/23/2018 3:24:17 PM  
**To:** Tim\_hunt@afandpa.org  
**CC:** Atkinson, Emily [Atkinson.Emily@epa.gov]  
**Subject:** Bios for March 1 AF&PA-AWC meeting invite request

Hi Tim,  
Emily asked me to forward you David and Clint's bios – please see below.

Clint Woods serves as Deputy Assistant Administrator in U.S. EPA's Office of Air and Radiation. Prior to joining EPA in December 2017, Clint was the Executive Director of the Association of Air Pollution Control Agencies (AAPCA), a non-profit organization of state and local air quality agencies located in Lexington, Kentucky. While with AAPCA, he was also a member of U.S. EPA's National Advisory Council on Environmental Policy and Technology. Clint previously served as a professional staff member with the Committee on Science, Space, and Technology in the U.S. House of Representatives, the Energy, Environment, and Agriculture Task Force at the American Legislative Exchange Council, and Manager of Government Affairs with the Recreation Vehicle Industry Association. He holds an MA in international commerce and policy from George Mason University and a BA from the University of Mary Washington.

David Harlow serves as Senior Counsel to the Assistant Administrator in U.S. EPA's Office of Air and Radiation. Prior to coming to EPA, David had been in private practice for some 30 years with the law firm Hunton & Williams, LLP, in Richmond, Virginia and Washington, D.C., as a member of the firm's Environmental Law team. David received a J.D. from the University of Virginia School of Law and a B.A. from the College of William & Mary.

Many thanks,

Isabel DeLuca  
Deputy Director, Communications  
Office of Air and Radiation, US EPA  
(202) 343-9247

---

**From:** Hunt, Tim [mailto:Tim\_Hunt@afandpa.org]  
**Sent:** Monday, January 22, 2018 5:45 PM  
**To:** Atkinson, Emily <Atkinson.Emily@epa.gov>  
**Subject:** RE: March 1 AF&PA-AWC meeting invite request

Emily, Do you have bios for David and Clint that I could share with attendees? Tim

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**From:** Atkinson, Emily [mailto:Atkinson.Emily@epa.gov]  
**Sent:** Monday, January 22, 2018 2:08 PM  
**To:** Hunt, Tim <Tim\_Hunt@afandpa.org>  
**Subject:** FW: March 1 AF&PA-AWC meeting invite request

Hi Tim,

Just want to confirm Clint Woods and David Harlow plan to participate in person on Thursday, March 1 starting at 9:30am.



Emily Atkinson  
Management Analyst/Office Manager  
Immediate Office of the Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5412B, 1200 Pennsylvania Avenue NW  
Washington, DC 20460  
Voice: 202-564-1850  
Email: [atkinson.emily@epa.gov](mailto:atkinson.emily@epa.gov)

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**From:** Hunt, Tim [[mailto:Tim\\_Hunt@afandpa.org](mailto:Tim_Hunt@afandpa.org)]  
**Sent:** Friday, January 19, 2018 6:18 PM  
**To:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>  
**Cc:** Woods, Clint <[woods.clint@epa.gov](mailto:woods.clint@epa.gov)>; Harlow, David <[harlow.david@epa.gov](mailto:harlow.david@epa.gov)>  
**Subject:** RE: March 1 AF&PA-AWC meeting invite request

Emily,

I would like to request a meeting with David and Clint on March 1<sup>st</sup> from 9:30 to 10:30 at AF&PA's office at 1101 K St., NW. If Clint is traveling, we can provide conference call access for him. It would help my members if they reviewed the priority air issues they are working on focusing on NSR and PSD reforms and NAAQS standard setting and implementation. In addition, any insights on SSM policies including the SIP Call would be helpful.

The format can be very informal starting with a presentation and then transitioning to Q&A on the relevant topics. AF&PA and AWC provided extensive comments to EPA as part of the Reg Reform initiative with many focused on the air program.

I hope that is sufficient to schedule the meeting. Thanks for your help.

**Timothy Hunt**  
Senior Director, Air Quality Programs  
AMERICAN FOREST & PAPER ASSOCIATION  
AMERICAN WOOD COUNCIL  
1101 K Street, NW, Suite 700, Washington, DC 20005  
Office: 202-463-2588  
Email: [thunt@awc.org](mailto:thunt@awc.org) or [Tim\\_Hunt@afandpa.org](mailto:Tim_Hunt@afandpa.org)

---

**From:** Harlow, David [<mailto:harlow.david@epa.gov>]  
**Sent:** Friday, January 19, 2018 12:28 PM  
**To:** Hunt, Tim <[Tim\\_Hunt@afandpa.org](mailto:Tim_Hunt@afandpa.org)>  
**Cc:** Woods, Clint <[woods.clint@epa.gov](mailto:woods.clint@epa.gov)>; Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>  
**Subject:** RE: March 1 AF&PA-AWC meeting invite request

Tim,

To follow up on this, and in order to make formal arrangements ("formal," from the OAR Immediate Office's point of view, that is) for my attendance at your March 1 meeting, if you would be so good as to contact our Office Manager, Emily Atkinson, to make an "official" request – for a lack of a better word – for me to participate, she can take

steps to book me into our now-regularized system for handling the meeting/speaking requests that come in to OAR. I've taken the liberty here of including Emily on this message, so that she will already be aware of, and be on the lookout for, your request when it comes in.

I do already have something on my calendar for March 1, which runs from between 11:30 a.m. and 12:15 p.m., to which I'll need to attend, so if we can work around that, taking into account transit time, that would be great. Earlier that morning or some time post-lunch should work fine with me.

Again, I appreciate the invitation and look forward to speaking with you and your folks again. Thank you.

**David S. Harlow**  
**Senior Counsel**  
**Immediate Office of the Assistant Administrator**  
**Office of Air and Radiation, USEPA**  
**WJC-N Room 5409K**  
**1200 Pennsylvania Avenue NW**  
**Washington, DC 20460**  
**202-564-1233**  
[Harlow.David@epa.gov](mailto:Harlow.David@epa.gov)

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**From:** Harlow, David  
**Sent:** Wednesday, January 17, 2018 7:15 PM  
**To:** [Tim\\_hunt@afandpa.org](mailto:Tim_hunt@afandpa.org)  
**Cc:** Woods, Clint <[woods.clint@epa.gov](mailto:woods.clint@epa.gov)>  
**Subject:** Re: March 1 AF&PA-AWC meeting invite request

Tim,

Clint had previously mentioned to me this opportunity to address your group on March 1. I would be delighted to do so and appreciate the invitation.

In the coming few days I'll look to get in contact to arrange for a mutually agreeable time. Thanks again.

Sent from my iPhone

On Jan 17, 2018, at 1:03 PM, Hunt, Tim <[Tim\\_Hunt@afandpa.org](mailto:Tim_Hunt@afandpa.org)> wrote:

David,

We met in December when our coalition came in to talk about ambient air. I'd like to invite you to my March 1 meeting with member companies to review and discuss NSR and PSD permitting issues. As you know, these are top priorities for the trade associations. We've met with OAQPS staff many times over the

years but it would very helpful to get your perspective on the key issues and how EPA is approaching improvements to the program.

Clint is also considering participating to cover NAAQS issues but his "in town" schedule isn't clear yet.

I'm glad to work around your schedules to find the right time. We are at 12<sup>th</sup> and K so "right up the street" from your offices. I usually have 15 to 20 members attend our meetings.

Thanks for considering joining my meeting.

**Timothy Hunt**

Senior Director, Air Quality Programs  
AMERICAN FOREST & PAPER ASSOCIATION  
AMERICAN WOOD COUNCIL  
1101 K Street, NW, Suite 700, Washington, DC 20005  
Office: 202-463-2588  
Email: [thunt@awc.org](mailto:thunt@awc.org) or [Tim\\_Hunt@afandpa.org](mailto:Tim_Hunt@afandpa.org)

---

**From:** Woods, Clint [<mailto:woods.clint@epa.gov>]  
**Sent:** Monday, January 15, 2018 1:17 PM  
**To:** Hunt, Tim <[Tim\\_Hunt@afandpa.org](mailto:Tim_Hunt@afandpa.org)>  
**Subject:** RE: Updated Contact Information

Tim,

Thanks so much! There is a 50/50 chance I may be working remotely on that date but we ought to be able to get someone from our immediate office to participate in-person (David Harlow is the best POC for NSR/permitting and I'm handling NAAQS issues).

Clint

---

**From:** Hunt, Tim [[mailto:Tim\\_Hunt@afandpa.org](mailto:Tim_Hunt@afandpa.org)]  
**Sent:** Monday, January 15, 2018 10:59 AM  
**To:** Woods, Clint <[woods.clint@epa.gov](mailto:woods.clint@epa.gov)>  
**Subject:** RE: Updated Contact Information

Clint, Happy New Years to you and good seeing you at the CAAAC meeting in December. I was looking for your contact info on the EPA website and could not find it so thanks for providing.

My AF&PA and AWC air committees meet on March 1 here in town and I wanted to invite you to join us. You did this in your role at AAPCA two summers ago so know the people and what we look for in a guest speaker. Obviously, we would like to hear your insights into EPA's air priorities especially relating to NAAQS implementation and NSR/permitting as well. It depends on the breadth of your portfolio.

Would you be available for 45-60 minutes on 3/1? Right now I could work you in at any time. Thanks for considering the opportunity.

Tim

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**From:** Woods, Clint [<mailto:woods.clint@epa.gov>]  
**Sent:** Monday, January 15, 2018 10:53 AM  
**To:** Woods, Clint <[woods.clint@epa.gov](mailto:woods.clint@epa.gov)>  
**Subject:** Updated Contact Information

All,

Happy New Year! Late last year, I started a new position with the U.S. Environmental Protection Agency's Office of Air and Radiation in Washington, DC. It has been a great pleasure to work closely with you in the past, and I look forward to continuing to do so in this role. Below is my updated contact information, and please don't hesitate to reach out if there is anything I can do for you.

Thanks!

Clint Woods  
Deputy Assistant Administrator  
Office of Air and Radiation, U.S. EPA  
202.564.6562  
[woods.clint@epa.gov](mailto:woods.clint@epa.gov)

## Message

**From:** Dominguez, Alexander [dominguez.alexander@epa.gov]  
**Sent:** 3/26/2018 5:14:35 PM  
**To:** Seidman, Laura [Laura\_Seidman@afandpa.org]  
**CC:** Gunasekara, Mandy [Gunasekara.Mandy@epa.gov]; Atkinson, Emily [Atkinson.Emily@epa.gov]; Noe, Paul [Paul\_Noel@afandpa.org]; Harlow, David [harlow.david@epa.gov]  
**Subject:** RE: meeting request

Laura,

Mandy's travel schedule precludes her from attending a meeting Monday (04/02) or Tuesday (04/03) and looking at both their calendars, the earliest availability for both David and Mandy is April 18th. Let me know if you have availability then and happy to look at times. If you'd like to discuss by phone, please feel free to give me a call at

Personal Phone / Ex. 6

Best,  
 Alex

**Alex Dominguez**  
 Policy Analyst to the Principal Deputy  
 Office of Air and Radiation  
 U.S. Environmental Protection Agency

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**From:** Noe, Paul [mailto:Paul\_Noel@afandpa.org]  
**Sent:** Monday, March 26, 2018 10:49 AM  
**To:** Harlow, David <harlow.david@epa.gov>  
**Cc:** Gunasekara, Mandy <Gunasekara.Mandy@epa.gov>; Atkinson, Emily <Atkinson.Emily@epa.gov>; Dominguez, Alexander <dominguez.alexander@epa.gov>; Seidman, Laura <Laura\_Seidman@afandpa.org>  
**Subject:** Re: meeting request

Thank you, David. I will be out this week, but I am copying my colleague Laura Seidman who can help find a good time.

Best regards,

Paul

On Mar 26, 2018, at 10:28 AM, Harlow, David <harlow.david@epa.gov> wrote:

Paul,

I am taking the liberty here of forwarding your request to Emily Atkinson, our Office Manager, who handles these things and keeps account of our respective calendars. She should be able to (i) ascertain Mandy's availability, etc. (since I can't, of course, speak for her directly) and (ii) work with you to get this scheduled (if not April 1 or April 2, then at some point thereafter). Thanks.

**David S. Harlow**  
**Senior Counsel**

**Immediate Office of the Assistant Administrator**  
**Office of Air and Radiation, USEPA**  
**WJC-N Room 5409K**  
**1200 Pennsylvania Avenue NW**  
**Washington, DC 20460**  
**202-564-1233**  
[Harlow.David@epa.gov](mailto:Harlow.David@epa.gov)

---

**From:** Noe, Paul [[mailto:Paul\\_Noe@afandpa.org](mailto:Paul_Noe@afandpa.org)]  
**Sent:** Friday, March 23, 2018 5:04 PM  
**To:** Harlow, David <[harlow.david@epa.gov](mailto:harlow.david@epa.gov)>  
**Cc:** Gunasekara, Mandy <[Gunasekara.Mandy@epa.gov](mailto:Gunasekara.Mandy@epa.gov)>; Seidman, Laura <[Laura\\_Seidman@afandpa.org](mailto:Laura_Seidman@afandpa.org)>; Gale, Kat <[Kat\\_Gale@afandpa.org](mailto:Kat_Gale@afandpa.org)>; [eflanagan@nafoalliance.org](mailto:eflanagan@nafoalliance.org)  
**Subject:** meeting request

Hi David:

Following up on my voice message, I am reaching out to see if we can schedule a meeting of AF&PA, NAFO and AWC with you and Mandy to discuss biomass carbon neutrality. I am copying my colleagues, particularly Laura, who can help coordinate a time that is convenient for you both. Off hand, how is Monday April 1 or Tues morning, April 2?

Thank you for your consideration.

Best regards,

Paul

**Paul Noe**

Vice President for Public Policy

[Paul\\_Noe@afandpa.org](mailto:Paul_Noe@afandpa.org)

(202) 463-2777

AMERICAN FOREST & PAPER ASSOCIATION

1101 K Street, N.W., Suite 700

Washington, D.C. 20005

<image001.jpg> <image002.jpg> <image003.jpg><image004.jpg><image005.jpg><image006.jpg>

Message

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**From:** Atkinson, Emily [Atkinson.Emily@epa.gov]  
**Sent:** 4/2/2018 1:11:00 PM  
**To:** Hilary Moffett [moffetth@api.org]  
**Subject:** Confirmed 4/24 at 1pm: Meeting Request

Hi Hilary,

You are confirmed for a 45 minute meeting on Tuesday, April 24 at 1:00pm with Clint Woods.  
Directions and procedures to 1200 Pennsylvania Avenue NW:

**Metro:** If you come by Metro get off at the Federal Triangle metro stop. Exit the metro station and go up two sets of escalators to the surface level and turn right. You will see a short staircase and wheelchair ramp leading to a set of glass doors with the EPA logo - that is the William Jefferson Clinton Federal Building, North Entrance.

**Taxi:** Direct the taxi to drop you off on 12th Street NW, between Constitution and Pennsylvania Avenues, at the elevator for the Federal Triangle metro stop - this is almost exactly half way between the two avenues on 12<sup>th</sup> Street NW. Facing the building with the EPA logo and American flags, walk toward the building and take the glass door on your right hand side with the escalators going down to the metro on your left – that is the North Lobby of the William Jefferson Clinton building.

**Security Procedures:** A government issued photo id is required to enter the building and it is suggested you arrive 15 minutes early in order to be cleared and arrive at the meeting room on time. Upon entering the lobby, the meeting attendees will be asked to pass through security and provide a photo ID for entrance. If you are a foreign national entering on a non-US passport, please let us know in advance, as there is a separate clearance process.

Upon arrival, let the guards know that you were instructed to call 202-564-7404 for a security escort. Please send me a list of participants in advance of the meeting and feel free to contact me should you need any additional information.

Emily

Emily Atkinson  
Management Analyst/Office Manager  
Immediate Office of the Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5412B, 1200 Pennsylvania Avenue NW  
Washington, DC 20460  
Voice: 202-564-1850  
Email: atkinson.emily@epa.gov

---

**From:** Hilary Moffett [mailto:moffetth@api.org]  
**Sent:** Monday, April 02, 2018 9:01 AM  
**To:** Atkinson, Emily <Atkinson.Emily@epa.gov>  
**Subject:** Re: Meeting Request

That's perfect! Thanks Emily. I'll send the attendees prior to the meeting.

Happy Monday!

On Apr 2, 2018, at 8:58 AM, Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)> wrote:

Hi Hilary,

It looks like Clint Woods could be available for a 45 minute meeting on Tuesday, April 24 at 1:00pm.

Please advise if this could work on your end.

Emily

Emily Atkinson  
Management Analyst/Office Manager  
Immediate Office of the Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5412B, 1200 Pennsylvania Avenue NW  
Washington, DC 20460  
Voice: 202-564-1850  
Email: [atkinson.emily@epa.gov](mailto:atkinson.emily@epa.gov)

---

**From:** Woods, Clint  
**Sent:** Friday, March 30, 2018 11:29 AM  
**To:** Hilary Moffett <[moffetth@api.org](mailto:moffetth@api.org)>  
**Cc:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>  
**Subject:** RE: Meeting Request

Hilary,

Sorry for the delay – That would be great! I think we will have a lot more to share in the latter half of April, and I've copied Emily Atkinson who may be able to help us find a good date/time. We're happy to include the folks from OAQPS too if it would be helpful.

On a related front, earlier in the week we provided a memo with some updated modeling and potential flexibilities for states in developing good neighbor SIPs for the 2015 ozone NAAQS:  
<https://www.epa.gov/airmarkets/march-2018-memo-and-supplemental-information-regarding-interstate-transport-sips-2015>

Thanks!

Clint Woods  
Deputy Assistant Administrator  
Office of Air and Radiation, U.S. EPA  
202.564.6562

---

**From:** Hilary Moffett [<mailto:moffetth@api.org>]  
**Sent:** Wednesday, March 28, 2018 10:43 AM  
**To:** Woods, Clint <[woods.clint@epa.gov](mailto:woods.clint@epa.gov)>  
**Subject:** Meeting Request

Hi Clint,



I hope this email finds you well. It was great to see you at the RTR signing last week. I'm reaching out to see if you have some time for a meeting on ozone implementation. We visited with you back in January on exceptional events, international transport, and background ozone. We'd like to come back in and talk about efforts by the agency to address these issues and how we can be helpful. Do you have 30 minutes in the coming weeks to chat?

Thanks for your consideration!

Regards,  
Hilary

Hilary Moffett  
Director, Federal Relations  
American Petroleum Institute  
202-682-8040 (desk)  
612-710-8696 (cell)  
[MoffettH@api.org](mailto:MoffettH@api.org)

Message

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**From:** Woods, Clint [woods.clint@epa.gov]  
**Sent:** 4/23/2018 8:42:31 PM  
**To:** Atkinson, Emily [Atkinson.Emily@epa.gov]  
**Subject:** FW: Meeting Attendees

Clint Woods  
Deputy Assistant Administrator  
Office of Air and Radiation, U.S. EPA  
202.564.6562

---

**From:** Hilary Moffett [mailto:moffetth@api.org]  
**Sent:** Monday, April 23, 2018 4:20 PM  
**To:** Woods, Clint <woods.clint@epa.gov>  
**Subject:** Meeting Attendees

Hi Clint,

We're looking forward to the meeting with you tomorrow at 1pm. The list of attendees is as follows:

Hilary Moffett  
Ted Steichen  
Kevin Medeiros  
Khary Cauthen  
Stephen Higley  
Kate Fay  
Puneet Verma  
Dale Thanjan  
Marnie Funk

Please let me know if you need anything else from me.

Thanks,  
Hilary

Hilary Moffett  
Director, Federal Relations  
American Petroleum Institute  
202-682-8040 (desk)  
612-710-8696 (cell)  
[MoffettH@api.org](mailto:MoffettH@api.org)

## Message

**From:** Noe, Paul [Paul\_Noe@afandpa.org]  
**Sent:** 3/26/2018 2:49:09 PM  
**To:** Harlow, David [harlow.david@epa.gov]  
**CC:** Gunasekara, Mandy [Gunasekara.Mandy@epa.gov]; Atkinson, Emily [Atkinson.Emily@epa.gov]; Dominguez, Alexander [dominguez.alexander@epa.gov]; Seidman, Laura [Laura\_Seidman@afandpa.org]  
**Subject:** Re: meeting request

Thank you, David. I will be out this week, but I am copying my colleague Laura Seidman who can help find a good time.

Best regards,

Paul

On Mar 26, 2018, at 10:28 AM, Harlow, David <harlow.david@epa.gov> wrote:

Paul,

I am taking the liberty here of forwarding your request to Emily Atkinson, our Office Manager, who handles these things and keeps account of our respective calendars. She should be able to (i) ascertain Mandy's availability, etc. (since I can't, of course, speak for her directly) and (ii) work with you to get this scheduled (if not April 1 or April 2, then at some point thereafter). Thanks.

**David S. Harlow**

**Senior Counsel**

**Immediate Office of the Assistant Administrator**

**Office of Air and Radiation, USEPA**

**WJC-N Room 5409K**

**1200 Pennsylvania Avenue NW**

**Washington, DC 20460**

**202-564-1233**

[Harlow.David@epa.gov](mailto:Harlow.David@epa.gov)

**From:** Noe, Paul [mailto:Paul\_Noe@afandpa.org]

**Sent:** Friday, March 23, 2018 5:04 PM

**To:** Harlow, David <harlow.david@epa.gov>

**Cc:** Gunasekara, Mandy <Gunasekara.Mandy@epa.gov>; Seidman, Laura <Laura\_Seidman@afandpa.org>; Gale, Kat <Kat\_Gale@afandpa.org>; eflanagan@nafoalliance.org

**Subject:** meeting request

Hi David:

Following up on my voice message, I am reaching out to see if we can schedule a meeting of AF&PA, NAFO and AWC with you and Mandy to discuss biomass carbon neutrality. I am copying my colleagues, particularly Laura, who can help coordinate a time that is convenient for you both. Off hand, how is Monday April 1 or Tues morning, April 2?

Thank you for your consideration.

Best regards,

Paul

**Paul Noe**

Vice President for Public Policy

[Paul\\_Noe@afandpa.org](mailto:Paul_Noe@afandpa.org)

(202) 463-2777

AMERICAN FOREST & PAPER ASSOCIATION

1101 K Street, N.W., Suite 700

Washington, D.C. 20005

Message

---

**From:** Dominguez, Alexander [dominguez.alexander@epa.gov]  
**Sent:** 4/16/2018 7:38:17 PM  
**To:** Hilary Moffett [moffetth@api.org]  
**CC:** Mara E. Zimmerman [ZimmermanM@api.org]; Gunasekara, Mandy [Gunasekara.Mandy@epa.gov]; DeLuca, Isabel [DeLuca.Isabel@epa.gov]; Atkinson, Emily [Atkinson.Emily@epa.gov]  
**Subject:** RE: May 1 API Legal Committee Call  
**Attachments:** Event Form OAR AA.DOCX

Hey Hilary,

Hope you had a good weekend and were able to enjoy the great weather on Saturday.

Mandy will likely be in transit at 10:00AM EST on May 1<sup>st</sup>, so to err on the side of caution we will likely want to try for another time slot. Have any other times already been booked or if the day is still pretty open? Additionally, if you could please fill out and return the attached event form that would be much appreciated.

Best,  
Alex

**Alex Dominguez**  
Policy Analyst to the Principal Deputy  
Office of Air and Radiation  
U.S. Environmental Protection Agency

---

**From:** Hilary Moffett [mailto:moffetth@api.org]  
**Sent:** Thursday, April 12, 2018 11:52 AM  
**To:** Gunasekara, Mandy <Gunasekara.Mandy@epa.gov>  
**Cc:** Dominguez, Alexander <dominguez.alexander@epa.gov>; Mara E. Zimmerman <ZimmermanM@api.org>  
**Subject:** May 1 API Legal Committee Call

Hi Mandy,

I hope this email finds you well. Thanks for agreeing to chat with API's Subcommittee on Environmental, Health, and Safety Law on May 1. The group has their meeting in Houston from 930-400 EST. Are you able to call in at 10:00am EST? The day is pretty open, but I always suggest trying to go first, so you know they're on schedule. If you have a different preferred time, just let me know and we'll make it happen. The group is the legal arm of API's thought on anything environmental related.

I will be in touch with more details about attendees in the near future.

Thanks,  
Hilary

Hilary Moffett  
Director, Federal Relations  
American Petroleum Institute  
202-682-8040 (desk)  
612-710-8696 (cell)  
[MoffettH@api.org](mailto:MoffettH@api.org)

Event Information Form
------------------------

This form has been designed to assist in planning participation in events and activities.  
This is not a confirmation of attendance.

### Basic Background

Name of Event	
Sponsoring Organization	
Date of Event	
Time of Event	
Expected time of remarks or participation by EPA official	
Location (please include city/town and street address)	
Directions to the event (if appropriate, please also include relevant information about parking, the specific building, and best entrance to use)	
Where to meet POC	

### Event Description and Role of the EPA official

Brief description or outline of the event	
Brochure, invitation and/or other event material(s)	
Agenda and order of speakers and biography/information of other speakers	
Name of person introducing EPA official	
Basic information about the role of the EPA official at the event. (For example, will they serve as a keynote speaker? Participate on a panel? Take part in a press conference? Tour a facility?)	
If the EPA official is a featured speaker, which topic(s) should they address and how long?	
What rules would the audience like to hear about?	
Will there be time for Q&A? If so, who will be moderating?	
Do you have a sense of the types of questions that may be asked?	
Recommendations on the use of visuals/PowerPoint. Should the EPA official plan on using a PowerPoint Presentation?	
What is the physical layout of the room (e.g. size, and format of the interaction; podium, seated in armchair dialogue, or at a table, etc.)	

About the Audience

Please tell us about the make-up of the audience for the event:	
Expected number in attendance at the event	
Will it be largely members of your organization?	
Will others be in attendance? If so, who will be at the event? (General public, Businesspeople, Educators, Families, Students – what grade level, Children – how old)	
Others? (Please describe)	
Is the event open to press?	

Contact Information

Your name:	
Telephone Number:	
Mailing Address:	
E-Mail Address:	
Cell Phone Number:	
Fax Number:	
Best way to reach you at the event?	

EPA Contact Person

Emily Atkinson, Administrative Speech Coordinator Personal Phone / Ex. 6

John Millett, Communications Director Personal Phone / Ex. 6

Message

---

**From:** Bodine, Susan [bodine.susan@epa.gov]  
**Sent:** 4/23/2018 8:13:45 PM  
**To:** Patrick Kelly [kellyp@api.org]  
**CC:** Brooks, Phillip [Brooks.Phillip@epa.gov]; Grundler, Christopher [grundler.christopher@epa.gov]; Wehrum, Bill [Wehrum.Bill@epa.gov]; Atkinson, Emily [Atkinson.Emily@epa.gov]; Kelley, Rosemarie [Kelley.Rosemarie@epa.gov]  
**Subject:** RE: API Letter to EPA RE: Enforcement of E15 Labeling Requirements

Thank you.

We will review.

Susan

Susan Parker Bodine  
Assistant Administrator  
Office of Enforcement and Compliance Assurance  
202-564-2440

---

**From:** Patrick Kelly [mailto:kellyp@api.org]  
**Sent:** Monday, April 23, 2018 3:48 PM  
**To:** Bodine, Susan <bodine.susan@epa.gov>  
**Cc:** Brooks, Phillip <Brooks.Phillip@epa.gov>; Grundler, Christopher <grundler.christopher@epa.gov>; Wehrum, Bill <Wehrum.Bill@epa.gov>; Atkinson, Emily <Atkinson.Emily@epa.gov>; Kelley, Rosemarie <Kelley.Rosemarie@epa.gov>  
**Subject:** API Letter to EPA RE: Enforcement of E15 Labeling Requirements

Ms. Bodine,  
Please see the attached letter from API regarding the enforcement of E15 Labeling Requirements.  
Regards,

**Patrick G. Kelly**  
American Petroleum Institute  
1220 L Street, NW Washington, DC 20005  
Office: 202-682-8192 | email: [kellyp@api.org](mailto:kellyp@api.org)



Message

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**From:** Baer, Louis [LBaer@cement.org]  
**Sent:** 3/23/2018 8:05:52 PM  
**To:** DeLuca, Isabel [DeLuca.Isabel@epa.gov]  
**CC:** Atkinson, Emily [Atkinson.Emily@epa.gov]; Franklin, Charles [CFranklin@cement.org]  
**Subject:** RE: Speaking Request during NACA Fly-In

Ms. DeLuca,

That is great news! Thank you for your response. We will complete the form and turn around next week. Have a great weekend.

Best,  
Louis

---

Louis A. Baer, Esq., CPEA  
Director/Assistant Counsel, Government Affairs  
Portland Cement Association  
1150 Connecticut Avenue NW, Suite 500  
Office: 202-719-1981  
Cell: 314-922-8041  
[lbaer@cement.org](mailto:lbaer@cement.org)  
[www.cement.org](http://www.cement.org)

---

**From:** DeLuca, Isabel [mailto:DeLuca.Isabel@epa.gov]  
**Sent:** Friday, March 23, 2018 4:00 PM  
**To:** Baer, Louis <LBaer@cement.org>  
**Cc:** Atkinson, Emily <Atkinson.Emily@epa.gov>; Franklin, Charles <CFranklin@cement.org>  
**Subject:** RE: Speaking Request during NACA Fly-In

Hi Louis,

Many thanks for your patience with this request – we have worked through his schedule and Bill Wehrum is pleased to accept your invitation for him to speak at your Cement and Concrete Fly-In in Washington, DC on April 24<sup>th</sup>. If you could please fill in the attached speaker request form, that will help us make arrangements. Bill's preference would be to speak earlier in the evening (so at or near 7 pm, rather than later on), if that is possible.

Best wishes,

Isabel DeLuca  
Deputy Director of Communications  
Office of Air and Radiation, US EPA  
(202) 343-9247

---

**From:** Baer, Louis [mailto:LBaer@cement.org]  
**Sent:** Monday, February 26, 2018 5:21 PM



**To:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>

**Cc:** Franklin, Charles <[CFranklin@cement.org](mailto:CFranklin@cement.org)>; Derby, Rachel <[RDerby@cement.org](mailto:RDerby@cement.org)>; Johnston, A. Todd <[atjohnston@cement.org](mailto:atjohnston@cement.org)>; Letendre, Daisy <[letendre.daisy@epa.gov](mailto:letendre.daisy@epa.gov)>

**Subject:** Speaking Request during NACA Fly-In

Ms. Atkinson,

On behalf of the North American Concrete Alliance (NACA), we would like to invite Mr. Wehrum to be the evening keynote speaker during our Second Annual Cement and Concrete Washington, D.C. Fly-In. The event will take place on April 24, 2018 at the Newseum Rooftop (555 Pennsylvania Avenue NW) from 7-9 PM and Mr. Wehrum is invited to speak anytime during the dinner. The invitation to Mr. Wehrum to be the keynote speaker is attached.

Please let us know if Mr. Wehrum is available to speak during the NACA Fly-In. We look forward to hearing from you. Thank you very much for your help.

Best,  
Louis

---

Louis A. Baer, Esq., CPEA  
Director/Assistant Counsel, Government Affairs  
Portland Cement Association  
1150 Connecticut Avenue NW, Suite 500  
Office: 202-719-1981  
Cell: 314-922-8041  
[lbaer@cement.org](mailto:lbaer@cement.org)  
[www.cement.org](http://www.cement.org)

## Message

**From:** DeLuca, Isabel [DeLuca.Isabel@epa.gov]  
**Sent:** 3/23/2018 8:00:08 PM  
**To:** Baer, Louis [LBaer@cement.org]  
**CC:** Atkinson, Emily [Atkinson.Emily@epa.gov]; Franklin, Charles [CFranklin@cement.org]  
**Subject:** RE: Speaking Request during NACA Fly-In  
**Attachments:** Event Form OAR AA.DOCX

Hi Louis,

Many thanks for your patience with this request – we have worked through his schedule and Bill Wehrum is pleased to accept your invitation for him to speak at your Cement and Concrete Fly-In in Washington, DC on April 24<sup>th</sup>. If you could please fill in the attached speaker request form, that will help us make arrangements. Bill's preference would be to speak earlier in the evening (so at or near 7 pm, rather than later on), if that is possible.

Best wishes,

Isabel DeLuca  
 Deputy Director of Communications  
 Office of Air and Radiation, US EPA  
 (202) 343-9247

---

**From:** Baer, Louis [mailto:LBaer@cement.org]  
**Sent:** Monday, February 26, 2018 5:21 PM  
**To:** Atkinson, Emily <Atkinson.Emily@epa.gov>  
**Cc:** Franklin, Charles <CFranklin@cement.org>; Derby, Rachel <RDerby@cement.org>; Johnston, A. Todd <atjohnston@cement.org>; Letendre, Daisy <letendre.daisy@epa.gov>  
**Subject:** Speaking Request during NACA Fly-In

Ms. Atkinson,

On behalf of the North American Concrete Alliance (NACA), we would like to invite Mr. Wehrum to be the evening keynote speaker during our Second Annual Cement and Concrete Washington, D.C. Fly-In. The event will take place on April 24, 2018 at the Newseum Rooftop (555 Pennsylvania Avenue NW) from 7-9 PM and Mr. Wehrum is invited to speak anytime during the dinner. The invitation to Mr. Wehrum to be the keynote speaker is attached.

Please let us know if Mr. Wehrum is available to speak during the NACA Fly-In. We look forward to hearing from you. Thank you very much for your help.

Best,  
 Louis

---

Louis A. Baer, Esq., CPEA  
 Director/Assistant Counsel, Government Affairs  
 Portland Cement Association  
 1150 Connecticut Avenue NW, Suite 500  
 Office: 202-719-1981

Cell: 314-922-8041

[lbaer@cement.org](mailto:lbaer@cement.org)

[www.cement.org](http://www.cement.org)

Message

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**From:** Baer, Louis [LBaer@cement.org]  
**Sent:** 3/29/2018 6:45:41 PM  
**To:** DeLuca, Isabel [DeLuca.Isabel@epa.gov]  
**CC:** Atkinson, Emily [Atkinson.Emily@epa.gov]; Franklin, Charles [CFranklin@cement.org]; Derby, Rachel [RDerby@cement.org]  
**Subject:** RE: Speaking Request during NACA Fly-In  
**Attachments:** Event Form OAR AA\_NACA\_03282018.docx

Isabel,

Here is the attached completed speaker's form for Mr. Wehrum. We would like Mr. Wehrum to speak at 6:45 PM so we can accommodate his preference for speaking in the early evening. Please let me know if you have any questions and need any further information or background materials. Thanks so much. Our members very much look forward to hearing him speak.

Best,  
Louis

---

Louis A. Baer, Esq., CPEA  
Director/Assistant Counsel, Government Affairs  
Portland Cement Association  
1150 Connecticut Avenue NW, Suite 500  
Office: 202-719-1981  
Cell: 314-922-8041  
[lbaer@cement.org](mailto:lbaer@cement.org)  
[www.cement.org](http://www.cement.org)

---

**From:** DeLuca, Isabel [mailto:DeLuca.Isabel@epa.gov]  
**Sent:** Friday, March 23, 2018 4:00 PM  
**To:** Baer, Louis <LBaer@cement.org>  
**Cc:** Atkinson, Emily <Atkinson.Emily@epa.gov>; Franklin, Charles <CFranklin@cement.org>  
**Subject:** RE: Speaking Request during NACA Fly-In

Hi Louis,

Many thanks for your patience with this request – we have worked through his schedule and Bill Wehrum is pleased to accept your invitation for him to speak at your Cement and Concrete Fly-In in Washington, DC on April 24<sup>th</sup>. If you could please fill in the attached speaker request form, that will help us make arrangements. Bill's preference would be to speak earlier in the evening (so at or near 7 pm, rather than later on), if that is possible.

Best wishes,

Isabel DeLuca  
Deputy Director of Communications  
Office of Air and Radiation, US EPA  
(202) 343-9247

---

**From:** Baer, Louis [<mailto:LBaer@cement.org>]  
**Sent:** Monday, February 26, 2018 5:21 PM  
**To:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>  
**Cc:** Franklin, Charles <[CFranklin@cement.org](mailto:CFranklin@cement.org)>; Derby, Rachel <[RDerby@cement.org](mailto:RDerby@cement.org)>; Johnston, A. Todd <[atjohnston@cement.org](mailto:atjohnston@cement.org)>; Letendre, Daisy <[letendre.daisy@epa.gov](mailto:letendre.daisy@epa.gov)>  
**Subject:** Speaking Request during NACA Fly-In

Ms. Atkinson,

On behalf of the North American Concrete Alliance (NACA), we would like to invite Mr. Wehrum to be the evening keynote speaker during our Second Annual Cement and Concrete Washington, D.C. Fly-In. The event will take place on April 24, 2018 at the Newseum Rooftop (555 Pennsylvania Avenue NW) from 7-9 PM and Mr. Wehrum is invited to speak anytime during the dinner. The invitation to Mr. Wehrum to be the keynote speaker is attached.

Please let us know if Mr. Wehrum is available to speak during the NACA Fly-In. We look forward to hearing from you. Thank you very much for your help.

Best,  
Louis

---

Louis A. Baer, Esq., CPEA  
Director/Assistant Counsel, Government Affairs  
Portland Cement Association  
1150 Connecticut Avenue NW, Suite 500  
Office: 202-719-1981  
Cell: 314-922-8041  
[lbaer@cement.org](mailto:lbaer@cement.org)  
[www.cement.org](http://www.cement.org)



America's Cement Manufacturers™

Portland Cement Association  
1150 Connecticut Avenue, NW, Suite 500  
Washington, DC 20036-4104  
202.462.9404 Fax 202.462.0877  
www.cement.org

February 9, 2018

Daisy Letendre  
Senior Advisor for Policy and Strategic Communications  
Office of the Administrator  
Office of Policy (MC-1804A)  
1200 Pennsylvania Avenue NW

**Re: Request for Meeting with Mr. William L. Wehrum in March or April 2018**

Dear Daisy:

First let me express my appreciation for your tremendous help and responsibility to the cement industry over the last several months. We have found the new Smart Sector program, and you in particular, to be invaluable tools in promoting a constructive dialogue between EPA and our industry on regulatory issues and priorities. To further this dialogue, the Portland Cement Association (PCA) is formally requesting a meeting with Mr. William L. Wehrum, the Assistant Administrator for the Office of Air & Radiation.

PCA is the leading voice for the U.S. cement manufacturing industry. Our members are responsible for more than 92 percent of the portland cement production capacity in the United States, have facilities in all 50 states, and serve nearly every Congressional district. Our mission focuses on improving and expanding the quality and uses of cement and concrete, raising the quality of construction, and contributing to a better environment.

Federal regulatory policy under the Clean Air Act ("CAA") is one of the most significant regulatory drivers for the cement industry, and continued, economically-practicable compliance is a top priority. Our members must comply with a variety of CAA programs, including National Ambient Air Quality Standards, New Source Review, National Emissions Standards for Hazardous Air Pollutants, Regional Haze Standards, and associated permitting programs. The industry is also committed to advancing the sustainability of its facilities and operations.

With this meeting, PCA hopes to initiate a constructive dialogue with Mr. Wehrum and his team regarding the unique issues facing the cement industry, identify barriers to compliance and economic operations, and explore the status of key regulatory proceedings relevant to the cement industry. To the extent practicable with Mr. Wehrum's schedule, we would respectfully request a meeting during the third week of March or the first two weeks of April. PCA attendees would include PCA staff and select leaders from PCA member companies.

Please do not hesitate to contact me at 202-719-1977 or [cfranklin@cement.org](mailto:cfranklin@cement.org) if you would like to discuss this request further. Thank you.

Sincerely,

/S/

Charles L. Franklin  
Vice President & Counsel  
Government Affairs

Message

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**From:** Dominguez, Alexander [dominguez.alexander@epa.gov]  
**Sent:** 2/27/2018 1:30:25 PM  
**To:** Franklin, Charles [CFranklin@cement.org]  
**CC:** Atkinson, Emily [Atkinson.Emily@epa.gov]; Letendre, Daisy [letendre.daisy@epa.gov]; Baer, Louis [LBaer@cement.org]; Johnston, A. Todd [atjohnston@cement.org]  
**Subject:** RE: Portland Cement Association Meeting Request

Morning Charles,

You are confirmed for a 45 minute meeting on Friday, March 16<sup>th</sup> at 11:00AM. I will certainly invite David and OAR will be well represented. Please send me a list of participants, discussion items, and any materials in advance of the meeting in order to ensure we have the proper technical staff in the room.

Directions and procedures to 1200 Pennsylvania Avenue NW:

Metro: If you come by Metro get off at the Federal Triangle metro stop. Exit the metro station and go up two sets of escalators to the surface level and turn right. You will see a short staircase and wheelchair ramp leading to a set of glass doors with the EPA logo - that is the William Jefferson Clinton Federal Building, North Entrance.

Taxi: Direct the taxi to drop you off on 12th Street NW, between Constitution and Pennsylvania Avenues, at the elevator for the Federal Triangle metro stop - this is almost exactly half way between the two avenues on 12th Street NW. Facing the building with the EPA logo and American flags, walk toward the building and take the glass door on your right hand side with the escalators going down to the metro on your left – that is the North Lobby of the William Jefferson Clinton building.

Security Procedures: A government issued photo id is required to enter the building and it is suggested you arrive 15 minutes early in order to be cleared and arrive at the meeting room on time. Upon entering the lobby, the meeting attendees will be asked to pass through security and provide a photo ID for entrance. Let the guards know that you were instructed to call 202-564-7404 for a security escort.

Feel free to contact me should you need any additional information.

**Alex Dominguez**

Policy Analyst to the Principal Deputy  
 Office of Air and Radiation  
 U.S. Environmental Protection Agency

---

**From:** Franklin, Charles [mailto:CFranklin@cement.org]  
**Sent:** Monday, February 26, 2018 4:55 PM  
**To:** Dominguez, Alexander <dominguez.alexander@epa.gov>  
**Cc:** Atkinson, Emily <Atkinson.Emily@epa.gov>; Letendre, Daisy <letendre.daisy@epa.gov>; Baer, Louis <LBaer@cement.org>; Johnston, A. Todd <atjohnston@cement.org>  
**Subject:** RE: Portland Cement Association Meeting Request

Hi Alex:

Thank you for the message. We are disappointed to hear of Bill's recusal but understand and certainly appreciate the opportunity to meet with Mandy and Clint. May we do 11 am on March 16, as suggested? Also, would it be possible to include David Harlow in that meeting?



We are looking forward to introducing PCA's environmental team and sharing information on some of the industry's key environmental policy issues.

Best



Charles L. Franklin  
Vice President and Counsel, Government Affairs  
Portland Cement Association  
t. 202.719.1977 c. 202.297.4420  
e. [cfranklin@cement.org](mailto:cfranklin@cement.org) w. [cement.org](http://cement.org)

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**From:** Dominguez, Alexander [<mailto:dominguez.alexander@epa.gov>]  
**Sent:** Friday, February 23, 2018 4:05 PM  
**To:** Franklin, Charles <[CFranklin@cement.org](mailto:CFranklin@cement.org)>  
**Cc:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>; Letendre, Daisy <[letendre.daisy@epa.gov](mailto:letendre.daisy@epa.gov)>  
**Subject:** RE: Portland Cement Association Meeting Request with Bill Wehrum

Charles,

Due to recusal issues for Bill this meeting has been delegated to Mandy Gunasekara and Clint Woods. I'm happy to set something up for you. The morning of Friday, March 16<sup>th</sup> is currently available if you could do 10:00 or 11:00. Let me know if either of those would work.

Best,  
Alex

**Alex Dominguez**  
Policy Analyst to the Principal Deputy  
Office of Air and Radiation  
U.S. Environmental Protection Agency

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**From:** Franklin, Charles [<mailto:CFranklin@cement.org>]  
**Sent:** Friday, February 23, 2018 4:01 PM  
**To:** Letendre, Daisy <[letendre.daisy@epa.gov](mailto:letendre.daisy@epa.gov)>; Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>  
**Cc:** Dominguez, Alexander <[dominguez.alexander@epa.gov](mailto:dominguez.alexander@epa.gov)>  
**Subject:** RE: Portland Cement Association Meeting Request with Bill Wehrum

Thank you so much, Daisy. Emily, please let me know what I can provide to help you with this request.

Sincerely,



Charles L. Franklin  
Vice President and Counsel, Government Affairs  
Portland Cement Association  
t. 202.719.1977 c. 202.297.4420  
e. [cfranklin@cement.org](mailto:cfranklin@cement.org) w. [cement.org](http://cement.org)

---

**From:** Letendre, Daisy [<mailto:letendre.daisy@epa.gov>]  
**Sent:** Friday, February 23, 2018 11:20 AM  
**To:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>

**Cc:** Dominguez, Alexander <[dominguez.alexander@epa.gov](mailto:dominguez.alexander@epa.gov)>; Franklin, Charles <[CFranklin@cement.org](mailto:CFranklin@cement.org)>

**Subject:** Portland Cement Association Meeting Request with Bill Wehrum

Emily – pleased find the attached letter requesting a meeting with Bill Wehrum from Charles Franklin at Portland Cement. I work with Charles and PCA in my role with the Smart Sectors program but believe a meeting with Bill and PCA would be very productive.

I've cc'd Charles on this email so that you're able to coordinate directly with him but let me know if I can be of assistance!

Thanks so much,

**Daisy C. Letendre**

*Senior Advisor for Policy and Strategic Communications*

U.S. Environmental Protection Agency

Office of the Administrator

Office of Policy

202.564.0410 (O)

202.603.6231 (C)

Message

---

**From:** Baer, Louis [LBaer@cement.org]  
**Sent:** 3/6/2018 9:17:37 PM  
**To:** Dominguez, Alexander [dominguez.alexander@epa.gov]; Franklin, Charles [CFranklin@cement.org]  
**CC:** Atkinson, Emily [Atkinson.Emily@epa.gov]; Letendre, Daisy [letendre.daisy@epa.gov]; Johnston, A. Todd [atjohnston@cement.org]  
**Subject:** RE: Portland Cement Association Meeting Request

Alex,

Here is the list of PCA and member meeting participants:

Todd Johnston, PCA  
Charles Franklin, PCA  
Louis Baer, PCA  
Josh Reiner, PCA  
Adam Swercheck, Buzzi Unicem  
Curtis Lesslie, Ash Grove  
Scott Nielsen, Ash Grove  
Tim Schlosser, Continental Cement  
Jay Willis, Titan America

As for discussion topics, we would like to discuss the following issues:

Portland Cement NESHAP Residual Risk and Technology Review  
Hydrochloric Acid (HCl) Continuous Emissions Monitoring System (CEMS) Monitoring Issues  
2015 Ozone NAAQS  
NSR Reform – Cement Industry Priorities

We will let you know if we have any materials to provide in advance of the meeting. Please let us know if you need anything else. Thank you very much for arranging this meeting and we look forward to seeing you on March 22.

Best,  
Louis

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Louis A. Baer, Esq., CPEA  
Director/Assistant Counsel, Government Affairs  
Portland Cement Association  
1150 Connecticut Avenue NW, Suite 500  
Office: 202-719-1981  
Cell: 314-922-8041  
[lbaer@cement.org](mailto:lbaer@cement.org)  
[www.cement.org](http://www.cement.org)

---

**From:** Dominguez, Alexander [mailto:dominguez.alexander@epa.gov]  
**Sent:** Thursday, March 01, 2018 10:22 AM  
**To:** Baer, Louis <LBaer@cement.org>; Franklin, Charles <CFranklin@cement.org>  
**Cc:** Atkinson, Emily <Atkinson.Emily@epa.gov>; Letendre, Daisy <letendre.daisy@epa.gov>; Johnston, A. Todd <atjohnston@cement.org>  
**Subject:** RE: Portland Cement Association Meeting Request

Louis,

Confirmed for Thursday, March 22 at 1:00PM.

Directions and procedures to 1200 Pennsylvania Avenue NW:

Metro: If you come by Metro get off at the Federal Triangle metro stop. Exit the metro station and go up two sets of escalators to the surface level and turn right. You will see a short staircase and wheelchair ramp leading to a set of glass doors with the EPA logo - that is the William Jefferson Clinton Federal Building, North Entrance.

Taxi: Direct the taxi to drop you off on 12th Street NW, between Constitution and Pennsylvania Avenues, at the elevator for the Federal Triangle metro stop - this is almost exactly half way between the two avenues on 12th Street NW. Facing the building with the EPA logo and American flags, walk toward the building and take the glass door on your right hand side with the escalators going down to the metro on your left - that is the North Lobby of the William Jefferson Clinton building.

Security Procedures: A government issued photo id is required to enter the building and it is suggested you arrive 15 minutes early in order to be cleared and arrive at the meeting room on time. Upon entering the lobby, the meeting attendees will be asked to pass through security and provide a photo ID for entrance. Let the guards know that you were instructed to call 202-564-7404 for a security escort.

Please send me a list of participants and any materials in advance of the meeting. Feel free to contact me should you need any additional information.

**Alex Dominguez**

Policy Analyst to the Principal Deputy  
Office of Air and Radiation  
U.S. Environmental Protection Agency

---

**From:** Baer, Louis [mailto:LBaer@cement.org]

**Sent:** Thursday, March 1, 2018 10:11 AM

**To:** Dominguez, Alexander <dominguez.alexander@epa.gov>; Franklin, Charles <CFranklin@cement.org>

**Cc:** Atkinson, Emily <Atkinson.Emily@epa.gov>; Letendre, Daisy <letendre.daisy@epa.gov>; Johnston, A. Todd <atjohnston@cement.org>

**Subject:** RE: Portland Cement Association Meeting Request

Alex,

Sorry we got disconnected. We would like to schedule the meeting with Clint, David and Mandy for 1 PM on Thursday March 22. Please feel free to call me back with any questions. We look forward to meeting with them on Thursday March 22.

Best,  
Louis

---

Louis A. Baer, Esq., CPEA  
Director/Assistant Counsel, Government Affairs  
Portland Cement Association  
1150 Connecticut Avenue NW, Suite 500  
Office: 202-719-1981  
Cell: 314-922-8041

[lbaer@cement.org](mailto:lbaer@cement.org)

[www.cement.org](http://www.cement.org)

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**From:** Baer, Louis

**Sent:** Wednesday, February 28, 2018 10:26 AM

**To:** 'Dominguez, Alexander' <[dominguez.alexander@epa.gov](mailto:dominguez.alexander@epa.gov)>; Franklin, Charles <[CFranklin@cement.org](mailto:CFranklin@cement.org)>

**Cc:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>; Letendre, Daisy <[letendre.daisy@epa.gov](mailto:letendre.daisy@epa.gov)>; Johnston, A. Todd <[atjohnston@cement.org](mailto:atjohnston@cement.org)>

**Subject:** RE: Portland Cement Association Meeting Request

Alex,

Thank you for your help in setting up a meeting with Mandy, Clint and other representatives at EPA OAR. To introduce myself, I am the Director/Assistant Counsel at the Portland Cement Association and work with Todd and Charles on environment & energy regulatory affairs issues for PCA. We have spoken with members and we were wondering if OAR senior staff had flexibility in their schedules and were available for a meeting the following week on either Tuesday, March 20, Wednesday, March 21 or Thursday March 22. That would allow for our member leaders to travel to D.C. and join the meeting. It would be our preference to schedule a meeting for Thursday March 22 in the afternoon to maximize member participation but if there is no availability on Thursday, March 22 during the afternoon, please also let us know if there are available times on Tuesday, March 20, Wednesday, March 21, or Thursday, March 22. Thank you much for your flexibility. We look forward to hearing from you.

Best,

Louis

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Louis A. Baer, Esq., CPEA  
Director/Assistant Counsel, Government Affairs  
Portland Cement Association  
1150 Connecticut Avenue NW, Suite 500  
Office: 202-719-1981  
Cell: 314-922-8041  
[lbaer@cement.org](mailto:lbaer@cement.org)  
[www.cement.org](http://www.cement.org)

---

**From:** Dominguez, Alexander [<mailto:dominguez.alexander@epa.gov>]

**Sent:** Tuesday, February 27, 2018 8:30 AM

**To:** Franklin, Charles <[CFranklin@cement.org](mailto:CFranklin@cement.org)>

**Cc:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>; Letendre, Daisy <[letendre.daisy@epa.gov](mailto:letendre.daisy@epa.gov)>; Baer, Louis <[LBaer@cement.org](mailto:LBaer@cement.org)>; Johnston, A. Todd <[atjohnston@cement.org](mailto:atjohnston@cement.org)>

**Subject:** RE: Portland Cement Association Meeting Request

Morning Charles,

You are confirmed for a 45 minute meeting on Friday, March 16<sup>th</sup> at 11:00AM. I will certainly invite David and OAR will be well represented. Please send me a list of participants, discussion items, and any materials in advance of the meeting in order to ensure we have the proper technical staff in the room.

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Taxi: Direct the taxi to drop you off on 12th Street NW, between Constitution and Pennsylvania Avenues, at the elevator for the Federal Triangle metro stop - this is almost exactly half way between the two avenues on 12th Street NW. Facing the building with the EPA logo and American flags, walk toward the building and take the glass door on your right hand side with the escalators going down to the metro on your left – that is the North Lobby of the William Jefferson Clinton building.

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Feel free to contact me should you need any additional information.

**Alex Dominguez**

Policy Analyst to the Principal Deputy  
Office of Air and Radiation  
U.S. Environmental Protection Agency

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**From:** Franklin, Charles [<mailto:CFranklin@cement.org>]  
**Sent:** Monday, February 26, 2018 4:55 PM  
**To:** Dominguez, Alexander <[dominguez.alexander@epa.gov](mailto:dominguez.alexander@epa.gov)>  
**Cc:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>; Letendre, Daisy <[letendre.daisy@epa.gov](mailto:letendre.daisy@epa.gov)>; Baer, Louis <[LBaer@cement.org](mailto:LBaer@cement.org)>; Johnston, A. Todd <[atjohnston@cement.org](mailto:atjohnston@cement.org)>  
**Subject:** RE: Portland Cement Association Meeting Request

Hi Alex:

Thank you for the message. We are disappointed to hear of Bill's recusal but understand and certainly appreciate the opportunity to meet with Mandy and Clint. May we do 11 am on March 16, as suggested? Also, would it be possible to include David Harlow in that meeting?

We are looking forward to introducing PCA's environmental team and sharing information on some of the industry's key environmental policy issues.

Best



Charles L. Franklin  
Vice President and Counsel, Government Affairs  
Portland Cement Association  
t. 202.719.1977 c. 202.297.4420  
e. [cfranklin@cement.org](mailto:cfranklin@cement.org) w. [cement.org](http://cement.org)

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**From:** Dominguez, Alexander [<mailto:dominguez.alexander@epa.gov>]  
**Sent:** Friday, February 23, 2018 4:05 PM  
**To:** Franklin, Charles <[CFranklin@cement.org](mailto:CFranklin@cement.org)>  
**Cc:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>; Letendre, Daisy <[letendre.daisy@epa.gov](mailto:letendre.daisy@epa.gov)>  
**Subject:** RE: Portland Cement Association Meeting Request with Bill Wehrum

Charles,

Due to recusal issues for Bill this meeting has been delegated to Mandy Gunasekara and Clint Woods. I'm happy to set something up for you. The morning of Friday, March 16<sup>th</sup> is currently available if you could do 10:00 or 11:00. Let me know if either of those would work.

Best,  
Alex

**Alex Dominguez**

Policy Analyst to the Principal Deputy  
Office of Air and Radiation  
U.S. Environmental Protection Agency

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**From:** Franklin, Charles [<mailto:CFranklin@cement.org>]  
**Sent:** Friday, February 23, 2018 4:01 PM  
**To:** Letendre, Daisy <[letendre.daisy@epa.gov](mailto:letendre.daisy@epa.gov)>; Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>  
**Cc:** Dominguez, Alexander <[dominguez.alexander@epa.gov](mailto:dominguez.alexander@epa.gov)>  
**Subject:** RE: Portland Cement Association Meeting Request with Bill Wehrum

Thank you so much, Daisy. Emily, please let me know what I can provide to help you with this request.

Sincerely,



Charles L. Franklin  
Vice President and Counsel, Government Affairs  
Portland Cement Association  
t. 202.719.1977 c. 202.297.4420  
e. [cfranklin@cement.org](mailto:cfranklin@cement.org) w. [cement.org](http://cement.org)

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**From:** Letendre, Daisy [<mailto:letendre.daisy@epa.gov>]  
**Sent:** Friday, February 23, 2018 11:20 AM  
**To:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>  
**Cc:** Dominguez, Alexander <[dominguez.alexander@epa.gov](mailto:dominguez.alexander@epa.gov)>; Franklin, Charles <[CFranklin@cement.org](mailto:CFranklin@cement.org)>  
**Subject:** Portland Cement Association Meeting Request with Bill Wehrum

Emily – pleased find the attached letter requesting a meeting with Bill Wehrum from Charles Franklin at Portland Cement. I work with Charles and PCA in my role with the Smart Sectors program but believe a meeting with Bill and PCA would be very productive.

I've cc'd Charles on this email so that you're able to coordinate directly with him but let me know if I can be of assistance!

Thanks so much,

**Daisy C. Letendre**

Senior Advisor for Policy and Strategic Communications  
U.S. Environmental Protection Agency  
Office of the Administrator  
Office of Policy  
202.564.0410 (O)  
202.603.6231 (C)

Message

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**From:** Lynne Collins [COLLINS@api.org]  
on behalf of Frank Macchiarola [MacchiarolaF@api.org]  
**Sent:** 2/12/2018 5:18:17 PM  
**To:** Wehrum, Bill [Wehrum.Bill@epa.gov]  
**CC:** Atkinson, Emily [Atkinson.Emily@epa.gov]; Shaw, Nena [Shaw.Nena@epa.gov]; Grundler, Christopher [grundler.christopher@epa.gov]  
**Subject:** API Letter 2.12.18  
**Attachments:** API Letter 2.12.18.pdf

Please see the attached letter to Mr. William Wehrum from Frank Macchiarola, Group Director Downstream and Industry Operations with the American Petroleum Institute. Thank you.





Frank J. Macchiarola  
Group Director  
Downstream & Industry Operations

1220 L Street, NW  
Washington, DC 20005-4070  
USA  
Telephone 202-682-8167  
Fax 202-682-8051  
Email MacchiarolaF@api.org  
www.api.org

February 12, 2018

The Honorable William Wehrum  
Assistant Administrator  
U.S. Environmental Protection Agency  
Office of Air and Radiation  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

*Transmitted via email*

Re: **Renewable Fuel Standard Program: Requests for Waivers and Exemptions**

Dear Assistant Administrator Wehrum,

The burden of the Renewable Fuel Standard (RFS) program impacts the entire refining sector with costs that are ultimately borne by consumers. For years, the American Petroleum Institute (API)<sup>1</sup> has recommended that EPA should establish RFS standards that are consistent with the ability of the fuels marketplace to consume the required volumes of renewable fuels. When the RFS volume standards exceed the limits of the fuel distribution system and the vehicle fleet, significant market disruptions occur, and the overall cost of the program increases. The economic impact of high volume standards is felt across the marketplace.

Recently, arguments have been made that certain obligated parties are experiencing economic harm and are structurally disadvantaged by the RFS. Two specific examples are: 1) RFS waiver requests submitted by the states of Pennsylvania, New Mexico, Texas, and Delaware<sup>2</sup>; and 2) reports of small refinery exemption petitions. API does not agree with these arguments. Any RFS volume reductions contemplated by the agency must maintain a level playing field in the marketplace, and must apply equally across the whole refining sector. The ongoing issues with the RFS program are structural in nature, apply to all regulated parties, and need to be addressed on a nationwide basis. API recommends that EPA should deny the state waivers and should not approve any small refinery exemptions.

<sup>1</sup> The American Petroleum Institute (API) is the national trade association that represents all aspects of America's oil and natural gas industry. Our more than 625 corporate members - from the large major oil and gas companies to the small independents - come from all segments of the industry. They are producers, refiners, suppliers, marketers, pipeline operators and marine transporters as well as service and supply companies that support all segments of the industry. They provide most of the nation's energy and are backed by a growing grassroots movement of more than 30 million Americans. As refiners and importers of transportation fuels, our member companies are obligated parties under the Renewable Fuel Standard (RFS) program and subject to its requirements.

<sup>2</sup> Pennsylvania – Wolf, Tom. "Petition for RFS Waiver Under CAA Section 211(o)(7)(A)(i)." November 2, 2017  
New Mexico – Martinez, Susana. "Petition for RFS Waiver Under CAA Section 211(o)(7)(A)." November 22, 2017  
Texas – Abbott, Greg. Letter to The Honorable Scott Pruitt. December 1, 2017  
Delaware – Carney, John. "Petition for RFS Waiver under CAA Section 211(o)(7)(A)(i)." January 30, 2018

Regarding the state waiver requests, the Clean Air Act (CAA) provides EPA authority to waive the RFS requirements when the standards cause “severe harm to the economy or the environment” or when there is “inadequate domestic supply.”<sup>3</sup> The individual waiver requests rely on the claim of economic harm experienced by obligated parties in each state. Based on numerous studies and EPA’s own analysis, individual refineries in these states are faced with the same compliance requirements as refineries in other states and are not disadvantaged based on their location. Furthermore, the RFS is an annual program that applies on a nationwide basis, excluding Alaska. There is no practical rationale for waiving the standard for a specific region or for a specific period. Granting state, region, or refinery specific RFS exemptions creates uncertainty and distorts the level playing field, resulting in harm for the non-exempted obligated parties. Therefore, EPA should deny these waiver requests.

For an individual small refinery, defined as a refinery whose average aggregate daily crude oil throughput does not exceed 75 thousand barrels per day (kbd), EPA may grant a temporary exemption from the annual RFS volume standards if compliance with RFS obligations will impose a “disproportionate economic hardship” on the refinery.<sup>4</sup> According to news reports, several small refineries have submitted petitions based on this hardship. These arguments center on the high cost of acquiring RINs, which are used by obligated parties to demonstrate compliance with the RFS. However, RIN acquisition is just one of many factors that determine the economic performance of a refinery.

Several studies have concluded that RIN costs are largely recovered by refineries, both large and small, through the increased value of gasoline and diesel fuel they supply to the market. EPA’s own analysis comes to the same conclusion. In EPA’s Denial of Petitions for Rulemaking to Change the RFS Point of Obligation,<sup>5</sup> the agency found that “while a merchant refiner is directly paying for the RINs they buy on the market, they are passing that cost along” and concluded that merchant refiners are not disadvantaged compared to integrated refiners in terms of their costs of compliance. This dynamic applies equally to small refineries as it does to merchant refiners and evidences the fact that the RFS program is not causing disproportionate harm on small refiners. Further, the decision also noted: “If exempted, [small refiners] could have a (potentially significant) financial advantage over parties that do have RFS obligations and this dynamic could result in an increasing number of small businesses entering this market.” These points make clear that small refinery exemptions are unnecessary as all parties should be subject to the same regulatory costs as their competitors.

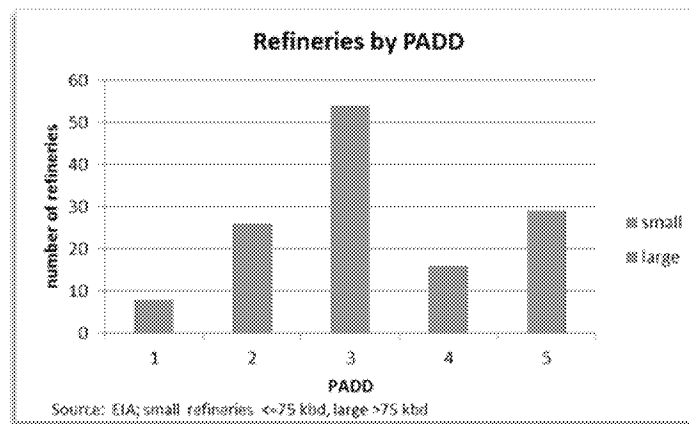
The Figure below shows that there are small refineries throughout the US. In PADD 4 for example, 15 out of 16 refineries have crude distillation capacity that does not exceed 75 kbd.

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<sup>3</sup> CAA 211(o)(7)

<sup>4</sup> 40 CFR Part 80.1441

<sup>5</sup> Assessment and Standards Division Office of Transportation and Air Quality U.S. Environmental Protection Agency, Denial of Petitions for Rulemaking to Change the RFS Point of Obligation. EPA-420-R-17-008. November 2017.



Furthermore, PADD markets do not work in isolation. For example, refineries in PADD 3 supply products to PADD 1. EPA should ensure any reductions in the RFS volume obligations apply equally across the refining industry. Small refinery exemptions, especially when granted retroactively, introduce additional uncertainty and RIN market disruptions.

It is ultimately up to Congress to repeal or reform the RFS. Meanwhile, API seeks regulatory solutions that: are based on sound science; are achievable for regulated parties; are cost effective for the consumer; and, maintain a level playing field in the market. As the size of a refinery alone does not determine operational competitiveness in the marketplace, it is not appropriate for EPA to grant small refiner exemptions to the RFS program. Similarly, it is not appropriate to grant state petitions to waive the RFS program that are based on the premise that RIN acquisition adversely impacts small or merchant refiners, or to otherwise relieve these obligated parties of their obligations.

The best available remedy is for EPA to use its waiver authority to establish annual volumes that are reasonable, achievable, and fair for all RFS stakeholders. Granting individual requests for relief creates a distortion in the marketplace and threatens the integrity of the RFS program. API welcomes the opportunity to work with EPA to develop regulatory solutions to meet these goals.

API and our member companies appreciate your attention to these issues. If you have any questions or concerns, please contact me at (202) 682-8167.

Sincerely,

Frank J. Macchiarola  
Group Director  
Downstream & Industry Operations



America's Cement Manufacturers™

Portland Cement Association  
1150 Connecticut Avenue, NW, Suite 500  
Washington, DC 20036-4104  
202.462.9404 Fax 202.462.0877  
www.cement.org

February 9, 2018

Daisy Letendre  
Senior Advisor for Policy and Strategic Communications  
Office of the Administrator  
Office of Policy (MC-1804A)  
1200 Pennsylvania Avenue NW

**Re: Request for Meeting with Mr. William L. Wehrum in March or April 2018**

Dear Daisy:

First let me express my appreciation for your tremendous help and responsibility to the cement industry over the last several months. We have found the new Smart Sector program, and you in particular, to be invaluable tools in promoting a constructive dialogue between EPA and our industry on regulatory issues and priorities. To further this dialogue, the Portland Cement Association (PCA) is formally requesting a meeting with Mr. William L. Wehrum, the Assistant Administrator for the Office of Air & Radiation.

PCA is the leading voice for the U.S. cement manufacturing industry. Our members are responsible for more than 92 percent of the portland cement production capacity in the United States, have facilities in all 50 states, and serve nearly every Congressional district. Our mission focuses on improving and expanding the quality and uses of cement and concrete, raising the quality of construction, and contributing to a better environment.

Federal regulatory policy under the Clean Air Act ("CAA") is one of the most significant regulatory drivers for the cement industry, and continued, economically-practicable compliance is a top priority. Our members must comply with a variety of CAA programs, including National Ambient Air Quality Standards, New Source Review, National Emissions Standards for Hazardous Air Pollutants, Regional Haze Standards, and associated permitting programs. The industry is also committed to advancing the sustainability of its facilities and operations.

With this meeting, PCA hopes to initiate a constructive dialogue with Mr. Wehrum and his team regarding the unique issues facing the cement industry, identify barriers to compliance and economic operations, and explore the status of key regulatory proceedings relevant to the cement industry. To the extent practicable with Mr. Wehrum's schedule, we would respectfully request a meeting during the third week of March or the first two weeks of April. PCA attendees would include PCA staff and select leaders from PCA member companies.

Please do not hesitate to contact me at 202-719-1977 or [cfranklin@cement.org](mailto:cfranklin@cement.org) if you would like to discuss this request further. Thank you.

Sincerely,

/S/

Charles L. Franklin  
Vice President & Counsel  
Government Affairs

Message

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**From:** Hunt, Tim [Tim\_Hunt@afandpa.org]  
**Sent:** 1/22/2018 10:44:17 PM  
**To:** Atkinson, Emily [Atkinson.Emily@epa.gov]  
**Subject:** RE: March 1 AF&PA-AWC meeting invite request

Thanks so much for the quick reply. Tim

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**From:** Atkinson, Emily [mailto:Atkinson.Emily@epa.gov]  
**Sent:** Monday, January 22, 2018 2:08 PM  
**To:** Hunt, Tim <Tim\_Hunt@afandpa.org>  
**Subject:** FW: March 1 AF&PA-AWC meeting invite request

Hi Tim,

Just want to confirm Clint Woods and David Harlow plan to participate in person on Thursday, March 1 starting at 9:30am.

Emily Atkinson  
Management Analyst/Office Manager  
Immediate Office of the Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5412B, 1200 Pennsylvania Avenue NW  
Washington, DC 20460  
Voice: 202-564-1850  
Email: [atkinson.emily@epa.gov](mailto:atkinson.emily@epa.gov)

---

**From:** Hunt, Tim [mailto:Tim\_Hunt@afandpa.org]  
**Sent:** Friday, January 19, 2018 6:18 PM  
**To:** Atkinson, Emily <Atkinson.Emily@epa.gov>  
**Cc:** Woods, Clint <[woods.clint@epa.gov](mailto:woods.clint@epa.gov)>; Harlow, David <[harlow.david@epa.gov](mailto:harlow.david@epa.gov)>  
**Subject:** RE: March 1 AF&PA-AWC meeting invite request

Emily,

I would like to request a meeting with David and Clint on March 1<sup>st</sup> from 9:30 to 10:30 at AF&PA's office at 1101 K St., NW. If Clint is traveling, we can provide conference call access for him. It would help my members if they reviewed the priority air issues they are working on focusing on NSR and PSD reforms and NAAQS standard setting and implementation. In addition, any insights on SSM policies including the SIP Call would be helpful.

The format can be very informal starting with a presentation and then transitioning to Q&A on the relevant topics. AF&PA and AWC provided extensive comments to EPA as part of the Reg Reform initiative with many focused on the air program.

I hope that is sufficient to schedule the meeting. Thanks for your help.

**Timothy Hunt**  
Senior Director, Air Quality Programs  
AMERICAN FOREST & PAPER ASSOCIATION

AMERICAN WOOD COUNCIL  
1101 K Street, NW, Suite 700, Washington, DC 20005  
Office: 202-463-2588  
Email: [thunt@awc.org](mailto:thunt@awc.org) or [Tim\\_Hunt@afandpa.org](mailto:Tim_Hunt@afandpa.org)

---

**From:** Harlow, David [<mailto:harlow.david@epa.gov>]  
**Sent:** Friday, January 19, 2018 12:28 PM  
**To:** Hunt, Tim <[Tim\\_Hunt@afandpa.org](mailto:Tim_Hunt@afandpa.org)>  
**Cc:** Woods, Clint <[woods.clint@epa.gov](mailto:woods.clint@epa.gov)>; Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>  
**Subject:** RE: March 1 AF&PA-AWC meeting invite request

Tim,

To follow up on this, and in order to make formal arrangements (“formal,” from the OAR Immediate Office’s point of view, that is) for my attendance at your March 1 meeting, if you would be so good as to contact our Office Manager, Emily Atkinson, to make an “official” request – for a lack of a better word – for me to participate, she can take steps to book me into our now-regularized system for handling the meeting/speaking requests that come in to OAR. I’ve taken the liberty here of including Emily on this message, so that she will already be aware of, and be on the lookout for, your request when it comes in.

I do already have something on my calendar for March 1, which runs from between 11:30 a.m. and 12:15 p.m., to which I’ll need to attend, so if we can work around that, taking into account transit time, that would be great. Earlier that morning or some time post-lunch should work fine with me.

Again, I appreciate the invitation and look forward to speaking with you and your folks again. Thank you.

**David S. Harlow**  
**Senior Counsel**  
**Immediate Office of the Assistant Administrator**  
**Office of Air and Radiation, USEPA**  
**WJC-N Room 5409K**  
**1200 Pennsylvania Avenue NW**  
**Washington, DC 20460**  
**202-564-1233**  
[Harlow.David@epa.gov](mailto:Harlow.David@epa.gov)

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**From:** Harlow, David  
**Sent:** Wednesday, January 17, 2018 7:15 PM  
**To:** [Tim\\_hunt@afandpa.org](mailto:Tim_hunt@afandpa.org)

**Cc:** Woods, Clint <[woods.clint@epa.gov](mailto:woods.clint@epa.gov)>

**Subject:** Re: March 1 AF&PA-AWC meeting invite request

Tim,

Clint had previously mentioned to me this opportunity to address your group on March 1. I would be delighted to do so and appreciate the invitation.

In the coming few days I'll look to get in contact to arrange for a mutually agreeable time. Thanks again.

Sent from my iPhone

On Jan 17, 2018, at 1:03 PM, Hunt, Tim <[Tim\\_Hunt@afandpa.org](mailto:Tim_Hunt@afandpa.org)> wrote:

David,

We met in December when our coalition came in to talk about ambient air. I'd like to invite you to my March 1 meeting with member companies to review and discuss NSR and PSD permitting issues. As you know, these are top priorities for the trade associations. We've met with OAQPS staff many times over the years but it would very helpful to get your perspective on the key issues and how EPA is approaching improvements to the program.

Clint is also considering participating to cover NAAQS issues but his "in town" schedule isn't clear yet.

I'm glad to work around your schedules to find the right time. We are at 12<sup>th</sup> and K so "right up the street" from your offices. I usually have 15 to 20 members attend our meetings.

Thanks for considering joining my meeting.

**Timothy Hunt**

Senior Director, Air Quality Programs  
AMERICAN FOREST & PAPER ASSOCIATION  
AMERICAN WOOD COUNCIL  
1101 K Street, NW, Suite 700, Washington, DC 20005  
Office: 202-463-2588  
Email: [thunt@awc.org](mailto:thunt@awc.org) or [Tim\\_Hunt@afandpa.org](mailto:Tim_Hunt@afandpa.org)

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**From:** Woods, Clint [<mailto:woods.clint@epa.gov>]

**Sent:** Monday, January 15, 2018 1:17 PM

**To:** Hunt, Tim <[Tim\\_Hunt@afandpa.org](mailto:Tim_Hunt@afandpa.org)>

**Subject:** RE: Updated Contact Information

Tim,

Thanks so much! There is a 50/50 chance I may be working remotely on that date but we ought to be able to get someone from our immediate office to participate in-person (David Harlow is the best POC for NSR/permitting and I'm handling NAAQS issues).

Clint

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**From:** Hunt, Tim [[mailto:Tim\\_Hunt@afandpa.org](mailto:Tim_Hunt@afandpa.org)]

**Sent:** Monday, January 15, 2018 10:59 AM



**To:** Woods, Clint <[woods.clint@epa.gov](mailto:woods.clint@epa.gov)>

**Subject:** RE: Updated Contact Information

Clint, Happy New Years to you and good seeing you at the CAAAC meeting in December. I was looking for your contact info on the EPA website and could not find it so thanks for providing.

My AF&PA and AWC air committees meet on March 1 here in town and I wanted to invite you to join us. You did this in your role at AAPCA two summers ago so know the people and what we look for in a guest speaker. Obviously, we would like to hear your insights into EPA's air priorities especially relating to NAAQS implementation and NSR/permitting as well. It depends on the breadth of your portfolio.

Would you be available for 45-60 minutes on 3/1? Right now I could work you in at any time. Thanks for considering the opportunity.

Tim

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**From:** Woods, Clint [<mailto:woods.clint@epa.gov>]

**Sent:** Monday, January 15, 2018 10:53 AM

**To:** Woods, Clint <[woods.clint@epa.gov](mailto:woods.clint@epa.gov)>

**Subject:** Updated Contact Information

All,

Happy New Year! Late last year, I started a new position with the U.S. Environmental Protection Agency's Office of Air and Radiation in Washington, DC. It has been a great pleasure to work closely with you in the past, and I look forward to continuing to do so in this role. Below is my updated contact information, and please don't hesitate to reach out if there is anything I can do for you.

Thanks!

Clint Woods  
Deputy Assistant Administrator  
Office of Air and Radiation, U.S. EPA  
202.564.6562  
[woods.clint@epa.gov](mailto:woods.clint@epa.gov)

## Message

**From:** Hutchins, Thomas D (Tom) [Thomas\_Hutchins@kindermorgan.com]  
**Sent:** 1/8/2018 2:54:54 PM  
**To:** Harlow, David [harlow.david@epa.gov]  
**CC:** Atkinson, Emily [Atkinson.Emily@epa.gov]  
**Subject:** Re: Follow Up on Meeting with Administrator Pruitt

David,

Thank you for the email, Emily's contact information and specific topics for discussion.

**Personal Matters / Ex. 6**

It will be later this week before I follow up with Emily.

Sent from my iPhone  
 Thomas D. Hutchins  
 713-420-7918 Office  
 713-705-0683 Cell  
 Thomas\_hutchins@kindermorgan.com<mailto:Thomas\_hutchins@kindermorgan.com>

On Jan 8, 2018, at 8:18 AM, Harlow, David <harlow.david@epa.gov<mailto:harlow.david@epa.gov>> wrote:

[This email message was received from the Internet and came from outside of Kinder Morgan]

Tom,

To close the loop on this, if you or your people there would be so good as to contact Emily Atkinson, whom I am cc'ing on this email, to initiate a "formal" request, as it were, for a meeting, Emily will be happy to work with you to arrange for a suitable date and time. (While I think email would work best all around, I believe her office number is [Personal Phone / Ex. 6])

Based on your having mentioned your wish to follow up on some of the matters discussed with the Administrator back on December 7, my assumption is that top of the agenda would be NSPS 0000a. If you all should have any other/additional air-related topics to discuss, please let Emily know, so that she/we can arrange to have the right people from our end available (e.g., program staff) to participate, in addition to Mandy and me.

Thank you.

David S. Harlow  
 Senior Counsel  
 Immediate Office of the Assistant Administrator  
 Office of Air and Radiation, USEPA  
 WJC-N Room 5409K  
 1200 Pennsylvania Avenue NW  
 Washington, DC 20460  
 202-564-1233  
 Harlow.David@epa.gov<mailto:Harlow.David@epa.gov>

-----Original Message-----

**From:** Harlow, David  
**Sent:** Friday, January 5, 2018 8:08 PM  
**To:** Hutchins, Thomas D (Tom) <Thomas\_Hutchins@kindermorgan.com<mailto:Thomas\_Hutchins@kindermorgan.com>>  
**Subject:** Re: Follow Up on Meeting with Administrator Pruitt

Tom,

Please accept my apologies for taking so long to get back to you. I'm afraid I let the afternoon get away from me.

I'd be delighted to have a follow up meeting to discuss those matters that were at issue when you and your colleagues were here meeting with the Administrator, Samantha, and me on December 8. As you will recall, Bill himself was recused from participating in that meeting due to his prior representation of your company. As this remains the case, I would propose that Mandy Gunasekara, our Principal Deputy Assistant Administrator, participate this time around. (She would have done so last month, of course, but was on travel that particular day.)

The best way to proceed, I think, is for you to get in contact with Emily Atkinson, the Office Manager for the OAR "immediate office." She oversees the scheduling for those of us here. I will get back in

touch with you on Monday, via email, with some contact information for Emily. She'll be able to help us find a mutually convenient date to schedule a meeting.

I look forward to seeing you again in the near future.

Sent from my iPhone

On Jan 5, 2018, at 2:56 PM, Hutchins, Thomas D (Tom)  
<Thomas\_Hutchins@kindermorgan.com<mailto:Thomas\_Hutchins@kindermorgan.com>> wrote:

David,

I hope you had an enjoyable time welcoming 2018.

Is there an opportunity to follow up on some of the topics included in the material provided during the December 7 meeting with you, Samantha and Administrator Pruitt.

I was reading today about the improvements being made by the permit streamlining team and really appreciate their efforts and accomplishments.

I look forward to hearing from you.

Sent from my iPhone

Thomas D. Hutchins

713-420-7918 Office

713-705-0683 Cell

Thomas\_hutchins@kindermorgan.com<mailto:Thomas\_hutchins@kindermorgan.com><mailto:Thomas\_hutchins@kindermorgan.com>

## Message

**From:** Dominguez, Alexander [dominguez.alexander@epa.gov]  
**Sent:** 4/20/2018 11:44:00 AM  
**To:** Dominguez, Alexander [dominguez.alexander@epa.gov]  
**Subject:** Confirmation: May 1 API Legal Committee Call

---

**From:** Dominguez, Alexander  
**Sent:** Friday, April 20, 2018 7:43 AM  
**To:** 'Hilary Moffett' <moffetth@api.org>  
**Cc:** Atkinson, Emily <Atkinson.Emily@epa.gov>; DeLuca, Isabel <DeLuca.Isabel@epa.gov>  
**Subject:** RE: May 1 API Legal Committee Call

Confirmed for Tuesday, May 1<sup>st</sup> 12:00 EST.

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**From:** Hilary Moffett [mailto:moffetth@api.org]  
**Sent:** Friday, April 20, 2018 7:37 AM  
**To:** Dominguez, Alexander <dominguez.alexander@epa.gov>  
**Subject:** Re: May 1 API Legal Committee Call

Great. Let's block 12-12:45. Thanks Alex.

On Apr 20, 2018, at 7:17 AM, Dominguez, Alexander <dominguez.alexander@epa.gov> wrote:

Morning Hilary,

Happy Friday and apologies for the delay getting back to you – working out some logistical details on our end as Mandy will be on travel that day. Between 11:00 - 1:00 EST would work great. She'll just need to wrap up around 12:45 so whatever time in there you think would be best.

Alex

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**From:** Hilary Moffett [mailto:moffetth@api.org]  
**Sent:** Tuesday, April 17, 2018 9:24 AM  
**To:** Dominguez, Alexander <dominguez.alexander@epa.gov>  
**Subject:** FW: May 1 API Legal Committee Call

**Hi Alex,**

Attached is the form. We can make the day as open as needed for Mandy ☺ What about noon EST? or 3pm EST?

Thanks,  
Hilary

---

**From:** Dominguez, Alexander [mailto:dominguez.alexander@epa.gov]  
**Sent:** Monday, April 16, 2018 3:38 PM  
**To:** Hilary Moffett

**Cc:** Mara E. Zimmerman; Gunasekara, Mandy; DeLuca, Isabel; Atkinson, Emily

**Subject:** RE: May 1 API Legal Committee Call

Hey Hilary,

Hope you had a good weekend and were able to enjoy the great weather on Saturday.

Mandy will likely be in transit at 10:00AM EST on May 1<sup>st</sup>, so to err on the side of caution we will likely want to try for another time slot. Have any other times already been booked or if the day is still pretty open? Additionally, if you could please fill out and return the attached event form that would be much appreciated.

Best,  
Alex

**Alex Dominguez**

Policy Analyst to the Principal Deputy  
Office of Air and Radiation  
U.S. Environmental Protection Agency

---

**From:** Hilary Moffett [<mailto:moffetth@api.org>]

**Sent:** Thursday, April 12, 2018 11:52 AM

**To:** Gunasekara, Mandy <[Gunasekara.Mandy@epa.gov](mailto:Gunasekara.Mandy@epa.gov)>

**Cc:** Dominguez, Alexander <[dominguez.alexander@epa.gov](mailto:dominguez.alexander@epa.gov)>; Mara E. Zimmerman  
<[ZimmermanM@api.org](mailto:ZimmermanM@api.org)>

**Subject:** May 1 API Legal Committee Call

Hi Mandy,

I hope this email finds you well. Thanks for agreeing to chat with API's Subcommittee on Environmental, Health, and Safety Law on May 1. The group has their meeting in Houston from 930-400 EST. Are you able to call in at 10:00am EST? The day is pretty open, but I always suggest trying to go first, so you know they're on schedule. If you have a different preferred time, just let me know and we'll make it happen. The group is the legal arm of API's thought on anything environmental related.

I will be in touch with more details about attendees in the near future.

Thanks,  
Hilary

Hilary Moffett  
Director, Federal Relations  
American Petroleum Institute  
202-682-8040 (desk)  
612-710-8696 (cell)  
[MoffettH@api.org](mailto:MoffettH@api.org)

## Message

---

**From:** Dominguez, Alexander [dominguez.alexander@epa.gov]  
**Sent:** 4/20/2018 11:43:06 AM  
**To:** Hilary Moffett [moffetth@api.org]  
**CC:** Atkinson, Emily [Atkinson.Emily@epa.gov]; DeLuca, Isabel [DeLuca.Isabel@epa.gov]  
**Subject:** RE: May 1 API Legal Committee Call

Confirmed for Tuesday, May 1<sup>st</sup> 12:00 EST.

---

**From:** Hilary Moffett [mailto:moffetth@api.org]  
**Sent:** Friday, April 20, 2018 7:37 AM  
**To:** Dominguez, Alexander <dominguez.alexander@epa.gov>  
**Subject:** Re: May 1 API Legal Committee Call

Great. Let's block 12-12:45. Thanks Alex.

On Apr 20, 2018, at 7:17 AM, Dominguez, Alexander <[dominguez.alexander@epa.gov](mailto:dominguez.alexander@epa.gov)> wrote:

Morning Hilary,

Happy Friday and apologies for the delay getting back to you – working out some logistical details on our end as Mandy will be on travel that day. Between 11:00 - 1:00 EST would work great. She'll just need to wrap up around 12:45 so whatever time in there you think would be best.

Alex

---

**From:** Hilary Moffett [mailto:moffetth@api.org]  
**Sent:** Tuesday, April 17, 2018 9:24 AM  
**To:** Dominguez, Alexander <[dominguez.alexander@epa.gov](mailto:dominguez.alexander@epa.gov)>  
**Subject:** FW: May 1 API Legal Committee Call

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Hilary

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**From:** Dominguez, Alexander [mailto:[dominguez.alexander@epa.gov](mailto:dominguez.alexander@epa.gov)]  
**Sent:** Monday, April 16, 2018 3:38 PM  
**To:** Hilary Moffett  
**Cc:** Mara E. Zimmerman; Gunasekara, Mandy; DeLuca, Isabel; Atkinson, Emily  
**Subject:** RE: May 1 API Legal Committee Call

Hey Hilary,

Hope you had a good weekend and were able to enjoy the great weather on Saturday.

Mandy will likely be in transit at 10:00AM EST on May 1<sup>st</sup>, so to err on the side of caution we will likely want to try for another time slot. Have any other times already been booked or if the day is still pretty open? Additionally, if you could please fill out and return the attached event form that would be much appreciated.

Best,  
Alex

**Alex Dominguez**

Policy Analyst to the Principal Deputy  
Office of Air and Radiation  
U.S. Environmental Protection Agency

---

**From:** Hilary Moffett [<mailto:moffetth@api.org>]  
**Sent:** Thursday, April 12, 2018 11:52 AM  
**To:** Gunasekara, Mandy <[Gunasekara.Mandy@epa.gov](mailto:Gunasekara.Mandy@epa.gov)>  
**Cc:** Dominguez, Alexander <[dominguez.alexander@epa.gov](mailto:dominguez.alexander@epa.gov)>; Mara E. Zimmerman <[ZimmermanM@api.org](mailto:ZimmermanM@api.org)>  
**Subject:** May 1 API Legal Committee Call

Hi Mandy,

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I will be in touch with more details about attendees in the near future.

Thanks,  
Hilary

Hilary Moffett  
Director, Federal Relations  
American Petroleum Institute  
202-682-8040 (desk)  
612-710-8696 (cell)  
[MoffettH@api.org](mailto:MoffettH@api.org)

Message

---

**From:** Atkinson, Emily [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BB2155ADEF6A44AEA9410741F0C01D27-ATKINSON, EMILY]  
**Sent:** 1/25/2018 6:17:10 PM  
**To:** Hilary Moffett [moffetth@api.org]  
**CC:** Woods, Clint [woods.Clint@epa.gov]  
**Subject:** RE: MEeting Attendees

Thanks Hilary!

Emily Atkinson  
Management Analyst/Office Manager  
Immediate Office of the Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5412B, 1200 Pennsylvania Avenue NW  
Washington, DC 20460  
Voice: 202-564-1850  
Email: atkinson.emily@epa.gov

---

**From:** Hilary Moffett [mailto:moffetth@api.org]  
**Sent:** Thursday, January 25, 2018 1:14 PM  
**To:** Atkinson, Emily <Atkinson.Emily@epa.gov>  
**Cc:** Woods, Clint <woods.clint@epa.gov>  
**Subject:** MEeting Attendees

Hi Emily,

Please find the list of attendees for next week's meeting with Clint, David, and Mandy.

Don't hesitate to reach out if you need anything else from me.

Thanks,  
Hilary

Hilary Moffett  
Director, Federal Relations  
American Petroleum Institute  
202-682-8040 (desk)  
612-710-8696 (cell)  
[MoffettH@api.org](mailto:MoffettH@api.org)

Hilary Moffett  
Ted Steichen  
Stephen Higley  
Kevin Avery  
Khary Cauthen  
Lesley Schaaff  
Robert Nolan  
Dana Wood  
Marnie Funk  
Cathe Kalisz





Appointment

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**From:** Atkinson, Emily [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BB2155ADEF6A44AEA9410741F0C01D27-ATKINSON, EMILY]  
**Sent:** 4/23/2018 3:10:58 PM  
**To:** DeLuca, Isabel [DeLuca.Isabel@epa.gov]; John Millett [Millett.John@epa.gov]  
**Subject:** North American Concrete Alliance (NACA) Second Annual Cement and Concrete Washington, D.C. Fly-In Keynote Address (Confirmed)  
**Attachments:** FW: Speaking Request during NACA Fly-In; PCA Invite for Wehrum\_Keynote\_02262018.pdf; RE: Speaking Request during NACA Fly-In; Event Form OAR AA\_NACA\_03282018.docx; NACA Fly-In Speaking Confirmation - Bill Wehrum  
**Location:** Newseum Rooftop, 555 Pennsylvania Avenue NW - 8th Floor  
**Start:** 4/24/2018 10:45:00 PM  
**End:** 4/24/2018 11:45:00 PM  
**Show Time As:** Tentative

Bill agreed to the speech but will not stay for the dinner

POC: Louis A. Baer, Cell:  Personal Phone / Ex. 6



FW: Speaking  
Request during ...



PCA Invite for  
Wehrum\_Keynot...



RE: Speaking  
Request during ...



Event Form OAR  
AA\_NACA\_0328...



NACA Fly-In  
Speaking Confir...

Event Information Form
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This form has been designed to assist in planning participation in events and activities.  
This is not a confirmation of attendance.

### Basic Background

Name of Event	Second Annual Cement and Concrete Fly-In
Sponsoring Organization	North American Concrete Alliance (NACA)
Date of Event	April 24, 2018
Time of Event	6:45 PM
Expected time of remarks or participation by EPA official	20-30 Minutes
Location (please include city/town and street address)	Newseum Rooftop, 555 Pennsylvania Avenue NW
Directions to the event (if appropriate, please also include relevant information about parking, the specific building, and best entrance to use)	<u>Directions and Parking</u>
Where to meet POC	Lobby

### Event Description and Role of the EPA official

Brief description or outline of the event	Keynote Speech for Second Annual Cement and Concrete Fly-In
Brochure, invitation and/or other event material(s)	<a href="http://www.cement.org/flyin">http://www.cement.org/flyin</a>
Agenda and order of speakers and biography/information of other speakers	Discuss priorities for the Office of Air & Radiation
Name of person introducing EPA official	John Stull, CEO, LafargeHolcim (PCA Government Affairs Council Chair) or Dan Nugent, Senior Vice President, Technical Services & Government Affairs (E&E Committee Chair)
Basic information about the role of the EPA official at the event. (For example, will they serve as a keynote speaker? Participate on a panel? Take part in a press conference? Tour a facility?)	Keynote speaker
If the EPA official is a featured speaker, which topic(s) should they address and how long?	Please address Mr. Wehrum's priorities for the Office of Air & Radiation and issues that specifically impact the cement industry, including NSR Reform, Ozone NAAQS implementation and potential reconsideration and RTR reform. Also, please discuss the Clean Power Plan as it could impact the cement industry in the future.
What rules would the audience like to hear about?	Ozone NAAQS, Clean Power Plan, NSR Reform, RTR Reform
Will there be time for Q&A? If so, who will be moderating?	Yes, 15-20 minutes for Q&A.
Do you have a sense of the types of questions that may be asked?	Questions on Ozone NAAQS, Clean Power Plan, NSR Reform and priorities at Office of Air & Radiation

Recommendations on the use of visuals/PowerPoint. Should the EPA official plan on using a PowerPoint Presentation?	There is no need for a PowerPoint presentation
What is the physical layout of the room (e.g. size, and format of the interaction; podium, seated in armchair dialogue, or at a table, etc.)	Podium facing the audience in large banquet room

About the Audience

Please tell us about the make-up of the audience for the event:	Cement and concrete industry CEOs, member government affairs leaders and member environmental and occupational health and safety leaders.
Expected number in attendance at the event	100
Will it be largely members of your organization?	Yes
Will others be in attendance? If so, who will be at the event? (General public, Businesspeople, Educators, Families, Students – what grade level, Children – how old)	No, event is closed to the public
Others? (Please describe)	There will be a professional photographer who will want to take your picture after Mr. Wehrum's remarks. We can also coordinate on submitting a press release for his remarks.
Is the event open to press?	Event is closed to the press

Contact Information

Your name:	Louis Baer
Telephone Number:	Personal Phone / Ex. 6
Mailing Address:	1150 Connecticut Avenue NW Suite 500 Washington, DC 20036
E-Mail Address:	
Cell Phone Number:	Personal Phone / Ex. 6
Fax Number:	
Best way to reach you at the event?	Cell

EPA Contact Person

Emily Atkinson, Administrative Speech Coordinator: Personal Phone / Ex. 6  
 John Millett, Communications Director: Personal Phone / Ex. 6

Message

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**From:** Atkinson, Emily [Atkinson.Emily@epa.gov]  
**Sent:** 2/27/2018 12:56:58 PM  
**To:** DeLuca, Isabel [DeLuca.Isabel@epa.gov]; Millett, John [Millett.John@epa.gov]  
**CC:** Lewis, Josh [Lewis.Josh@epa.gov]  
**Subject:** FW: Speaking Request during NACA Fly-In  
**Attachments:** PCA Invite for Wehrum\_Keynote\_02262018.pdf

---

**From:** Baer, Louis [mailto:LBaer@cement.org]  
**Sent:** Monday, February 26, 2018 5:21 PM  
**To:** Atkinson, Emily <Atkinson.Emily@epa.gov>  
**Cc:** Franklin, Charles <CFranklin@cement.org>; Derby, Rachel <RDerby@cement.org>; Johnston, A. Todd <atjohnston@cement.org>; Letendre, Daisy <letendre.daisy@epa.gov>  
**Subject:** Speaking Request during NACA Fly-In

Ms. Atkinson,

On behalf of the North American Concrete Alliance (NACA), we would like to invite Mr. Wehrum to be the evening keynote speaker during our Second Annual Cement and Concrete Washington, D.C. Fly-In. The event will take place on April 24, 2018 at the Newseum Rooftop (555 Pennsylvania Avenue NW) from 7-9 PM and Mr. Wehrum is invited to speak anytime during the dinner. The invitation to Mr. Wehrum to be the keynote speaker is attached.

Please let us know if Mr. Wehrum is available to speak during the NACA Fly-In. We look forward to hearing from you. Thank you very much for your help.

Best,  
Louis

---

Louis A. Baer, Esq., CPEA  
Director/Assistant Counsel, Government Affairs  
Portland Cement Association  
1150 Connecticut Avenue NW, Suite 500  
Office: 202-719-1981  
Cell: 314-922-8041  
[lbaer@cement.org](mailto:lbaer@cement.org)  
[www.cement.org](http://www.cement.org)



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Portland Cement Association  
1150 Connecticut Avenue, NW, Suite 500  
Washington, DC 20036-4104  
202.408.0494 Fax 202.408.0877  
[www.cement.org](http://www.cement.org)

February 26, 2018

The Honorable William Wehrum  
Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
Washington, D.C. 20460

Dear Assistant Administrator Wehrum:

On behalf of the North American Concrete Alliance (NACA), I am pleased to invite you to be the evening keynote speaker during the Opening Dinner at the Second Annual Cement and Concrete Washington, D.C. Fly-In. The event will take place on April 24<sup>th</sup>, 2018, and you are invited to speak anytime between 7-9 pm.

The Second Annual Cement and Concrete Fly-In will be attended by trade associations and their membership (including CEOs) that are a part of the North American Concrete Alliance (NACA). NACA is comprised of the following groups: The American Concrete Pavement Association, American Concrete Pipe Association, American Concrete Pumping Association, American Concrete Pressure Pipe Association, Concrete Foundations Association, Concrete Reinforcing Steel Institute, National Concrete Masonry Association, National Precast Concrete Association, Precast/Prestressed Concrete Institute, Portland Cement Association, National Ready Mixed Concrete Association, Tilt-Up Concrete Association. The Cement and concrete product manufacturing indirectly employs approximately 500,000 people in our country, and our collective industries contribute approximately \$100 billion to our economy.

As the second most consumed product on Earth, behind water, it is critical that our industry maintain high environmental standards. Fly-In attendees would appreciate hearing about your current and long term goals on air issues for EPA. In particular, members would like to hear about EPA's efforts on the portland cement NESHAP Residual Risk & Technology Review, New Source Review reform, Ozone NAAQS reform, and other regulatory reform efforts. The Fly-In Opening Dinner will take place on Tuesday, April 24<sup>th</sup> at the Hyatt Regency Washington at The Newseum Rooftop (555 Pennsylvania Ave NW) from 7:00-9:00 pm.

Assistant Administrator Wehrum, it is our sincere hope that you will be able to join us as our industry comes to Washington. Your participation will make this a truly memorable event for NACA members and senior company representatives. Rachel Derby, Portland Cement Association's Vice President of Government Affairs, will contact your office shortly to provide any additional information that might be helpful. She can also be reached directly at 202-679-8223 or [rderby@cement.org](mailto:rderby@cement.org).

Sincerely,

A handwritten signature in black ink, appearing to read "A. Johnston", written over a horizontal line.

A. Todd Johnston  
Executive Vice President of Government Affairs

Message

---

**From:** Baer, Louis [LBaer@cement.org]  
**Sent:** 4/23/2018 3:09:25 PM  
**To:** DeLuca, Isabel [DeLuca.Isabel@epa.gov]  
**CC:** Atkinson, Emily [Atkinson.Emily@epa.gov]; Franklin, Charles [CFranklin@cement.org]; Derby, Rachel [RDerby@cement.org]  
**Subject:** NACA Fly-In Speaking Confirmation - Bill Wehrum  
**Attachments:** Event Form OAR AA\_NACA\_03282018.docx

Isabel,

We hope you had a great weekend. We are very much looking forward to having Bill Wehrum be our keynote speaker at the NACA Fly-In tomorrow evening, April 24<sup>th</sup>. The event will be held at the Newsuem Rooftop at 555 Pennsylvania Avenue NW on the 8<sup>th</sup> Floor. Mr. Wehrum is scheduled to speak at 6:45 PM. When he arrives, please have him come to the 8<sup>th</sup> Floor. I'm also happy to meet him in the lobby if he prefers. We will have a podium and microphone for him to address our group. After his remarks, there will be a short Q&A session.

Thank you very much for helping to arrange this opportunity to hear Mr. Wehrum speak. It will be very informative and rewarding for our members. If you or Mr. Wehrum need to contact me with help with logistics or anything else tomorrow in preparation for the event, my cell is Personal Phone / Ex. 6 We are looking forward to tomorrow.

Best,  
Louis

---

Louis A. Baer, Esq., CPEA  
Director/Assistant Counsel, Government Affairs  
Portland Cement Association  
1150 Connecticut Avenue NW, Suite 500  
Office: 202-719-1981  
Cell: 314-922-8041  
[lbaer@cement.org](mailto:lbaer@cement.org)  
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Event Information Form
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### Basic Background

Name of Event	Second Annual Cement and Concrete Fly-In
Sponsoring Organization	North American Concrete Alliance (NACA)
Date of Event	April 24, 2018
Time of Event	6:45 PM
Expected time of remarks or participation by EPA official	20-30 Minutes
Location (please include city/town and street address)	Newseum Rooftop, 555 Pennsylvania Avenue NW
Directions to the event (if appropriate, please also include relevant information about parking, the specific building, and best entrance to use)	<u>Directions and Parking</u>
Where to meet POC	Lobby

### Event Description and Role of the EPA official

Brief description or outline of the event	Keynote Speech for Second Annual Cement and Concrete Fly-In
Brochure, invitation and/or other event material(s)	<a href="http://www.cement.org/flyin">http://www.cement.org/flyin</a>
Agenda and order of speakers and biography/information of other speakers	Discuss priorities for the Office of Air & Radiation
Name of person introducing EPA official	John Stull, CEO, LafargeHolcim (PCA Government Affairs Council Chair) or Dan Nugent, Senior Vice President, Technical Services & Government Affairs (E&E Committee Chair)
Basic information about the role of the EPA official at the event. (For example, will they serve as a keynote speaker? Participate on a panel? Take part in a press conference? Tour a facility?)	Keynote speaker
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What rules would the audience like to hear about?	Ozone NAAQS, Clean Power Plan, NSR Reform, RTR Reform
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Recommendations on the use of visuals/PowerPoint. Should the EPA official plan on using a PowerPoint Presentation?	There is no need for a PowerPoint presentation
What is the physical layout of the room (e.g. size, and format of the interaction; podium, seated in armchair dialogue, or at a table, etc.)	Podium facing the audience in large banquet room

About the Audience

Please tell us about the make-up of the audience for the event:	Cement and concrete industry CEOs, member government affairs leaders and member environmental and occupational health and safety leaders.
Expected number in attendance at the event	100
Will it be largely members of your organization?	Yes
Will others be in attendance? If so, who will be at the event? (General public, Businesspeople, Educators, Families, Students – what grade level, Children – how old)	No, event is closed to the public
Others? (Please describe)	There will be a professional photographer who will want to take your picture after Mr. Wehrum's remarks. We can also coordinate on submitting a press release for his remarks.
Is the event open to press?	Event is closed to the press

Contact Information

Your name:	Louis Baer
Telephone Number:	Personal Phone / Ex. 6
Mailing Address:	1150 Connecticut Avenue NW Suite 500 Washington, DC 20036
E-Mail Address:	Personal Phone / Ex. 6
Cell Phone Number:	Personal Phone / Ex. 6
Fax Number:	
Best way to reach you at the event?	Cell

EPA Contact Person

Emily Atkinson, Administrative Speech Coordinator: Personal Phone / Ex. 6  
 John Millett, Communications Director: Personal Phone / Ex. 6



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1150 Connecticut Avenue, NW, Suite 500  
Washington, DC 20036-4104  
202.408.0494 Fax 202.408.0877  
[www.cement.org](http://www.cement.org)

February 26, 2018

The Honorable William Wehrum  
Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
Washington, D.C. 20460

Dear Assistant Administrator Wehrum:

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As the second most consumed product on Earth, behind water, it is critical that our industry maintain high environmental standards. Fly-In attendees would appreciate hearing about your current and long term goals on air issues for EPA. In particular, members would like to hear about EPA's efforts on the portland cement NESHAP Residual Risk & Technology Review, New Source Review reform, Ozone NAAQS reform, and other regulatory reform efforts. The Fly-In Opening Dinner will take place on Tuesday, April 24<sup>th</sup> at the Hyatt Regency Washington at The Newseum Rooftop (555 Pennsylvania Ave NW) from 7:00-9:00 pm.

Assistant Administrator Wehrum, it is our sincere hope that you will be able to join us as our industry comes to Washington. Your participation will make this a truly memorable event for NACA members and senior company representatives. Rachel Derby, Portland Cement Association's Vice President of Government Affairs, will contact your office shortly to provide any additional information that might be helpful. She can also be reached directly at 202-679-8223 or [rderby@cement.org](mailto:rderby@cement.org).

Sincerely,

A handwritten signature in black ink, appearing to read "A. Johnston", written in a cursive style.

A. Todd Johnston  
Executive Vice President of Government Affairs

## Message

**From:** Baer, Louis [LBaer@cement.org]  
**Sent:** 3/29/2018 6:45:41 PM  
**To:** DeLuca, Isabel [DeLuca.Isabel@epa.gov]  
**CC:** Atkinson, Emily [Atkinson.Emily@epa.gov]; Franklin, Charles [CFranklin@cement.org]; Derby, Rachel [RDerby@cement.org]  
**Subject:** RE: Speaking Request during NACA Fly-In  
**Attachments:** Event Form OAR AA\_NACA\_03282018.docx

Isabel,

Here is the attached completed speaker's form for Mr. Wehrum. We would like Mr. Wehrum to speak at 6:45 PM so we can accommodate his preference for speaking in the early evening. Please let me know if you have any questions and need any further information or background materials. Thanks so much. Our members very much look forward to hearing him speak.

Best,  
 Louis

---

Louis A. Baer, Esq., CPEA  
 Director/Assistant Counsel, Government Affairs  
 Portland Cement Association  
 1150 Connecticut Avenue NW, Suite 500  
 Office: 202-719-1981  
 Cell: 314-922-8041  
[lbaer@cement.org](mailto:lbaer@cement.org)  
[www.cement.org](http://www.cement.org)

---

**From:** DeLuca, Isabel [mailto:DeLuca.Isabel@epa.gov]  
**Sent:** Friday, March 23, 2018 4:00 PM  
**To:** Baer, Louis <LBaer@cement.org>  
**Cc:** Atkinson, Emily <Atkinson.Emily@epa.gov>; Franklin, Charles <CFranklin@cement.org>  
**Subject:** RE: Speaking Request during NACA Fly-In

Hi Louis,

Many thanks for your patience with this request – we have worked through his schedule and Bill Wehrum is pleased to accept your invitation for him to speak at your Cement and Concrete Fly-In in Washington, DC on April 24<sup>th</sup>. If you could please fill in the attached speaker request form, that will help us make arrangements. Bill's preference would be to speak earlier in the evening (so at or near 7 pm, rather than later on), if that is possible.

Best wishes,

**Isabel DeLuca**  
 Deputy Director of Communications  
 Office of Air and Radiation, US EPA  
 (202) 343-9247

---

**From:** Baer, Louis [<mailto:LBaer@cement.org>]  
**Sent:** Monday, February 26, 2018 5:21 PM  
**To:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>  
**Cc:** Franklin, Charles <[CFranklin@cement.org](mailto:CFranklin@cement.org)>; Derby, Rachel <[RDerby@cement.org](mailto:RDerby@cement.org)>; Johnston, A. Todd <[atjohnston@cement.org](mailto:atjohnston@cement.org)>; Letendre, Daisy <[letendre.daisy@epa.gov](mailto:letendre.daisy@epa.gov)>  
**Subject:** Speaking Request during NACA Fly-In

Ms. Atkinson,

On behalf of the North American Concrete Alliance (NACA), we would like to invite Mr. Wehrum to be the evening keynote speaker during our Second Annual Cement and Concrete Washington, D.C. Fly-In. The event will take place on April 24, 2018 at the Newseum Rooftop (555 Pennsylvania Avenue NW) from 7-9 PM and Mr. Wehrum is invited to speak anytime during the dinner. The invitation to Mr. Wehrum to be the keynote speaker is attached.

Please let us know if Mr. Wehrum is available to speak during the NACA Fly-In. We look forward to hearing from you. Thank you very much for your help.

Best,  
Louis

---

Louis A. Baer, Esq., CPEA  
Director/Assistant Counsel, Government Affairs  
Portland Cement Association  
1150 Connecticut Avenue NW, Suite 500  
Office: 202-719-1981  
Cell: 314-922-8041  
[lbaer@cement.org](mailto:lbaer@cement.org)  
[www.cement.org](http://www.cement.org)

## Message

**From:** Atkinson, Emily [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BB2155ADEF6A44AEA9410741F0C01D27-ATKINSON, EMILY]  
**Sent:** 4/2/2018 1:11:00 PM  
**To:** Hilary Moffett [moffetth@api.org]  
**BCC:** Atkinson, Emily [Atkinson.Emily@epa.gov]  
**Subject:** Confirmed 4/24 at 1pm: Meeting Request

Hi Hilary,

You are confirmed for a 45 minute meeting on Tuesday, April 24 at 1:00pm with Clint Woods.  
 Directions and procedures to 1200 Pennsylvania Avenue NW:

**Metro:** If you come by Metro get off at the Federal Triangle metro stop. Exit the metro station and go up two sets of escalators to the surface level and turn right. You will see a short staircase and wheelchair ramp leading to a set of glass doors with the EPA logo - that is the William Jefferson Clinton Federal Building, North Entrance.

**Taxi:** Direct the taxi to drop you off on 12th Street NW, between Constitution and Pennsylvania Avenues, at the elevator for the Federal Triangle metro stop - this is almost exactly half way between the two avenues on 12<sup>th</sup> Street NW. Facing the building with the EPA logo and American flags, walk toward the building and take the glass door on your right hand side with the escalators going down to the metro on your left – that is the North Lobby of the William Jefferson Clinton building.

**Security Procedures:** A government issued photo id is required to enter the building and it is suggested you arrive 15 minutes early in order to be cleared and arrive at the meeting room on time. Upon entering the lobby, the meeting attendees will be asked to pass through security and provide a photo ID for entrance. If you are a foreign national entering on a non-US passport, please let us know in advance, as there is a separate clearance process.

Upon arrival, let the guards know that you were instructed to call 202-564-7404 for a security escort. Please send me a list of participants in advance of the meeting and feel free to contact me should you need any additional information.

Emily

Emily Atkinson  
 Management Analyst/Office Manager  
 Immediate Office of the Assistant Administrator  
 Office of Air and Radiation, USEPA  
 Room 5412B, 1200 Pennsylvania Avenue NW  
 Washington, DC 20460  
 Voice: 202-564-1850  
 Email: atkinson.emily@epa.gov

---

**From:** Hilary Moffett [mailto:moffetth@api.org]  
**Sent:** Monday, April 02, 2018 9:01 AM  
**To:** Atkinson, Emily <Atkinson.Emily@epa.gov>  
**Subject:** Re: Meeting Request

That's perfect! Thanks Emily. I'll send the attendees prior to the meeting.

Happy Monday!

On Apr 2, 2018, at 8:58 AM, Atkinson, Emily <Atkinson.Emily@epa.gov> wrote:

Hi Hilary,

It looks like Clint Woods could be available for a 45 minute meeting on Tuesday, April 24 at 1:00pm.

Please advise if this could work on your end.

Emily

Emily Atkinson  
Management Analyst/Office Manager  
Immediate Office of the Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5412B, 1200 Pennsylvania Avenue NW  
Washington, DC 20460  
Voice: 202-564-1850  
Email: [atkinson.emily@epa.gov](mailto:atkinson.emily@epa.gov)

---

**From:** Woods, Clint  
**Sent:** Friday, March 30, 2018 11:29 AM  
**To:** Hilary Moffett <[moffetth@api.org](mailto:moffetth@api.org)>  
**Cc:** Atkinson, Emily <Atkinson.Emily@epa.gov>  
**Subject:** RE: Meeting Request

Hilary,

Sorry for the delay -- That would be great! I think we will have a lot more to share in the latter half of April, and I've copied Emily Atkinson who may be able to help us find a good date/time. We're happy to include the folks from OAQPS too if it would be helpful.

On a related front, earlier in the week we provided a memo with some updated modeling and potential flexibilities for states in developing good neighbor SIPs for the 2015 ozone NAAQS:  
<https://www.epa.gov/airmarkets/march-2018-memo-and-supplemental-information-regarding-interstate-transport-sips-2015>

Thanks!

Clint Woods  
Deputy Assistant Administrator  
Office of Air and Radiation, U.S. EPA  
202.564.6562

---

**From:** Hilary Moffett [<mailto:moffetth@api.org>]  
**Sent:** Wednesday, March 28, 2018 10:43 AM  
**To:** Woods, Clint <[woods.clint@epa.gov](mailto:woods.clint@epa.gov)>  
**Subject:** Meeting Request

Hi Clint,

I hope this email finds you well. It was great to see you at the RTR signing last week. I'm reaching out to see if you have some time for a meeting on ozone implementation. We visited with you back in January on exceptional events, international transport, and background ozone. We'd like to come back in and talk about efforts by the agency to address these issues and how we can be helpful. Do you have 30 minutes in the coming weeks to chat?

Thanks for your consideration!

Regards,  
Hilary

Hilary Moffett  
Director, Federal Relations  
American Petroleum Institute  
202-682-8040 (desk)  
612-710-8696 (cell)  
[MoffettH@api.org](mailto:MoffettH@api.org)

Message

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**From:** Atkinson, Emily [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BB2155ADEF6A44AEA9410741F0C01D27-ATKINSON, EMILY]  
**Sent:** 2/12/2018 2:57:38 PM  
**To:** Patrick Kelly [kellyp@api.org]  
**Subject:** RE: API Letter to Mr. Wehrum

Hi Patrick,

Bill Wehrum's email address is [Wehrum.bill@epa.gov](mailto:Wehrum.bill@epa.gov).

Let me know if you need anything else.

Emily Atkinson  
Management Analyst/Office Manager  
Immediate Office of the Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5412B, 1200 Pennsylvania Avenue NW  
Washington, DC 20460  
Voice: 202-564-1850  
Email: [atkinson.emily@epa.gov](mailto:atkinson.emily@epa.gov)

---

**From:** Patrick Kelly [mailto:kellyp@api.org]  
**Sent:** Monday, February 12, 2018 9:39 AM  
**To:** Atkinson, Emily <Atkinson.Emily@epa.gov>  
**Subject:** API Letter to Mr. Wehrum

Emily,

API would like to send Mr. Wehrum a letter today regarding the RFS Program. I was unable to find his address on the EPA website's National Locator. Would you send me an appropriate email address to use? I also left a message on your voicemail.

Thank you,  
Patrick Kelly  
API

**Patrick G. Kelly**

American Petroleum Institute  
1220 L Street, NW Washington, DC 20005  
Office: 202-682-8192 | email: [kellyp@api.org](mailto:kellyp@api.org)





Message

---

**From:** Noe, Paul [Paul\_Noe@afandpa.org]  
**Sent:** 2/19/2019 10:19:29 PM  
**To:** Rakosnik, Delaney [rakosnik.delaney@epa.gov]  
**CC:** Seidman, Laura [Laura\_Seidman@afandpa.org]  
**Subject:** Meeting Request  
**Attachments:** ATT00001.txt

Hi Delaney: I am following up on our earlier conversation to request a 1 hour meeting with David Harlow to discuss biomass carbon neutrality. Participants would include representatives of the American Forest & Paper Association, the American Wood Council, and the National Alliance of Forest Owners. Laura can follow up with specific attendees once we set a time. Here are times that would work for us:

Friday, March 1: 9:00am-5:00pm  
Monday, March 4: 9:00am-2:30pm; 4:15-5:30pm  
Tuesday, March 5: 9:00am-1:00pm  
Wednesday, March 6: 8:30-11:00am

I am copying my colleague Laura Seidman who can help confirm a time. Could you reply to us both to set a time that works for David?

Thank you for your help.

Best regards,

Paul

**Paul Noe**

Vice President for Public Policy

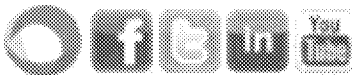
[Paul\\_Noe@afandpa.org](mailto:Paul_Noe@afandpa.org)

(202) 463-2777

AMERICAN FOREST & PAPER ASSOCIATION

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Washington, D.C. 20005



Message

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**From:** Smythe Anderson [AndersonS@api.org]  
**Sent:** 10/10/2018 1:02:34 PM  
**To:** Dominguez, Alexander [dominguez.alexander@epa.gov]  
**Subject:** API Meeting Request

**Flag:** Follow up

Hi Alex – I joined API on Monday from Chevron, working primarily regulatory issues. Puneet Verma shared your contact information with me.

Would it be possible to set up a meeting with Mandy for the week on Oct. 22 to discuss CTGs? I defer to your judgment on who to include on the invite, but OGC may be helpful. On our end, we will bring a group of API member companies and API staff to this discussion.

I will follow-up later on with a request to meet on the OOOOa rule. Puneet let Mandy know that these requests would be coming her way.

Thanks for your help,  
Smythe

**Smythe Anderson**  
Director of Federal Relations  
1220 L Street NW  
Washington, DC 20005  
202.682.8040  
[AndersonS@api.org](mailto:AndersonS@api.org)





America's Cement Manufacturers™

**Portland Cement Association  
Environment & Energy Committee Meeting  
Thursday, October 4, 2018  
8:30 AM – 5:00 PM (EDT)  
National Association of Manufacturers  
Global Room  
733 10th St. NW, Suite 700, Washington, DC**  
**Conference Call Info:** Personal Phone / Ex. 6 **Passcode:** Personal Phone / Ex. 6

**AGENDA**

- I. Opening Business (Dan Nugent & Curtis Lesslie)**
  - A. Introductions
  - B. Emergency Procedures
  - C. PCA Antitrust Statement
  - D. Approval of Meeting Minutes from May 7, 2018 Nashville Meeting
  - E. E&E Interim Webpage
  - F. EPA Nominations
  - G. D.C. Legislative Update
- II. EPA Smart Sectors and Regulatory Agenda Update (Guest Speakers: Daisy Letendre and Brittany Bolen, EPA Office of Policy)**
- III. Clean Air Subcommittee (Scott Nielson & Tim Schlosser)**
  - A. Portland Cement NESHAP
    - i. Final RTR Litigation Update (*Guest Speaker: Joshua Frank, Baker Botts*)
    - ii. PC NESHAP Guidance Update
  - B. Hg CEMS Above Span Calibration
  - C. NAAQS
    - i. New York Ozone Petition
    - ii. Ozone NAAQS
    - iii. Future NAAQS Revisions
- IV. EPA Office of Air & Radiation Priorities (Guest Speaker: Mandy Gunasekara)**

- V. Sustainable Manufacturing Subcommittee (Gina Lotito & Travis Reed)**
  - A. Sustainability Report Update
  - B. Expanding Ability to Combust Tires for Energy Recovery in Texas and Other States
  - C. Non-Hazardous Secondary Materials Revitalized Petition (*Guest Speakers: Claudia O'Brien, Latham & Watkins*)
- VI. Energy Subcommittee (Bhaskar Dusi & Brett Lindsay)**
  - A. Updates to PCA L&E Survey and Energy Star Energy Performance Indicator (*Guest Speaker: Betsy Dutrow, EPA Energy Star*)
  - B. Pyroprocessing Benchmarking Survey
- VII. Lunch Keynote Speakers – Senator Shelley Moore Capito (R-WV) and Henry Darwin, EPA Acting Deputy Administrator**
- VIII. Climate Change Subcommittee (Erika Guerra & Michelle Ferguson)**
  - A. Climate Change Regulation (*Guest Speakers: Robert Wyman and Stacey VanBellegham, Latham & Watkins*)
    - i. Clean Power Plan Litigation Update
    - ii. Proposed Affordable Clean Energy Rule
    - iii. Climate Change Legislative Update
    - iv. Climate Change Regulatory Analysis and PCA Engagement Strategy
  - B. Carbonation
- IX. Regulatory Development Subcommittee (Desirea Haggard & Brett Lindsay)**
  - A. TRI Reporting of Overburden
- X. Solid Waste and Water Subcommittee (Sarah Vance & Paul Detterline)**
  - A. Waters of the United States (WOTUS) Regulatory and Litigation Update
- XII. Other Business (Dan Nugent & Curtis Lesslie)**
  - A. Periodic Data Collection Effort
  - B. Other Discussion Items
- XIII. Adjourn**

Event Information Form
------------------------

This form has been designed to assist in planning participation in events and activities.  
This is not a confirmation of attendance.

### Basic Background

Name of Event	PCA Fall Environment & Energy Committee Meeting
Sponsoring Organization	Portland Cement Association
Date of Event	Thursday, October 4, 2018
Time of Event	10-10:30 AM
Expected time of remarks or participation by EPA Official	30 minutes, 10-15 minute remarks followed by Q&A
Location (please include city/town and street address)	National Association of Manufacturers, 733 10 <sup>th</sup> St. NW, Suite 700, Washington, D.C., Global Room
Directions to the event (if appropriate, please also include relevant information about parking, the specific building, and best entrance to use)	Entrance is on 10 <sup>th</sup> St. NW between G and H St. NW. There will be security at front desk in lobby and then take elevator to 7 <sup>th</sup> Floor where I will meet Mandy
Where to meet POC	7 <sup>th</sup> Floor at NAM

### Event Description and Role of the EPA official

Brief description or outline of the event	Meeting of PCA's Environment & Energy Committee
Brochure, invitation and/or other event material(s)	Agenda attached
Agenda and order of speakers and biography/information of other speakers	Agenda attached
Name of person introducing EPA Official	Charles Franklin, Vice President & Counsel, PCA
Basic information about the role of the EPA official at the event. (For example, will they serve as a keynote speaker? Participate on a panel? Take part in a press conference? Tour a facility?)	Featured Speaker
If the EPA official is a featured speaker, which topic(s) should they address and how long?	Please address New Source Review (NSR) Reform, NAAQS, Climate Change, NY Good Neighbor Petition, air regulatory reform and progress on other air priorities at the Office of Air & Radiation
What rules would the audience like to hear about?	NSR Reform, Ozone NAAQS implementation and future NAAQS rulemakings, Climate Change, NY Good Neighbor Petition, and other areas of air regulatory reform
Will there be time for Q&A? If so, who will be moderating?	Yes, Charles Franklin will moderate.
Do you have a sense of the types of questions that may be asked?	Questions on the priorities listed above.
Recommendations on the use of visuals/PowerPoint. Should the EPA official plan on using a PowerPoint Presentation?	There is no need for a PowerPoint presentation.

What is the physical layout of the room (e.g. size, and format of the interaction; podium, seated in armchair dialogue, or at a table, etc.)	Table arranged in square shape to facilitate conversation. There will be designated seat for Mandy to address the Committee.
--	--

About the Audience

Please tell us about the make-up of the audience for the event:	Cement industry senior environmental and government affairs leaders
Expected number in attendance at the event	30-35
Will it be largely members of your organization?	Yes
Will others be in attendance? If so, who will be at the event? (General public, Businesspeople, Educators, Families, Students – what grade level, Children – how old)	Only PCA staff and Committee Members
Others? (Please describe)	
Is the event open to press?	No

Contact Information

Your name:	Louis Baer
Telephone Number:	Personal Phone / Ex. 6
Mailing Address:	1150 Connecticut Avenue NW, Suite 500 Washington, D.C. 20036
E-Mail Address:	
Cell Phone Number:	Personal Phone / Ex. 6
Fax Number:	
Best way to reach you at the event?	Cell

EPA Contact Person

Alex Dominguez

## Message

**From:** Gergana Vasileva [GVasileva@thecwcgroup.com]  
**Sent:** 6/5/2018 3:32:28 PM  
**To:** Martha Yolanda Herrera Zapata [martha.herrera@ecopetrol.com.co]; Adams, Melissa E [MelissaAdams@washgas.com]; Ryan, Vanessa A [vanessa.ryan@chevron.com]; Hyde, Richard [RIHYDE@southernco.com]; Gelpi Leonardo [Leonardo.Gelpi@eni.com]; Wehrum, Bill [Wehrum.Bill@epa.gov]  
**CC:** Pryor, Justin [Pryor.Justin@epa.gov]; Sarah Sandison [ssandison@thecwcgroup.com]; Sawyer, Cheryl [sawj@chevron.com]; DeLuca, Isabel [DeLuca.Isabel@epa.gov]  
**Subject:** 27th World Gas Conference - Moderator Introduction - The Role of Voluntary Action in Methane Management (Friday June 28, 2018)  
**Attachments:** ATT00001.txt; WGC 2018 Workshop Speakers.pdf

Dear all,

In anticipation of the upcoming 27<sup>th</sup> World Gas Conference, please allow me to introduce **Brian M. Jones**, Senior Vice President, **M.J. Bradley & Associates, LLC** and the **moderator** of the Workshop session **The Role of Voluntary Action in Methane Management** which will take place on **Friday June 29, 2018** from **10:20 AM – 11:40 AM**.

The Workshop session is **1 hour 20 minutes in duration**. The session will commence with Brian introducing the session topic and each speaker. Each speaker will then have **8-10 minutes to deliver their presentation** and then return to their seat on stage. The session will conclude with audience Q&A.

The session will be made up of:

- **Opening Remarks: Bill Wehrum**, Assistant Administrator, Office of Air and Radiation, **U.S. Environmental Protection Agency (EPA)**
- **Leonardo Gelpi**, Climate Change / GHG Management Manager, **Eni Spa**
- **Melissa Adams**, Chief Corporate Social Responsibility Officer, **WGL Holdings/Washington Gas**
- **Richard Hyde**, Director External Affairs, **Southern Company Gas**
- **Vanessa Ryan**, Senior Advisor, Shale Issues, **Chevron Corporation**
- **Martha Yolanda Herrera Zapata**, Project Engineer, Innovation and Technology Center (ICP- Colombian Petroleum Institute), **Ecopetrol**.

**Please find the attached copies of all speaker biographies for your reference.**

If you have any questions regarding the points for discussion in the panel please do not hesitate to contact Brian.

Should you also wish to discuss the content further in a phone call, please do let me know and I will be more than happy to assist in setting this up.

I look forward to meeting you at the conference.

Best wishes,  
 Gergana

Gergana Vasileva  
 Speaker and Program Assistant, WGC 2018  
 CWC Solutions, part of CWC Group Limited  
 Direct Line: +44 20 79780064 w: [www.cwc-solutions.com](http://www.cwc-solutions.com)

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SPEAKER BIOGRAPHIES

**Brian M. Jones**  
Senior Vice President  
**M.J. Bradley & Associates, LLC**

As a Senior Vice President with M.J. Bradley & Associates (MJB&A), Brian Jones advises energy sector clients on strategy and policies related to climate change and sustainability. Brian's current efforts are focused on natural gas distribution and methane emissions strategies and policies, electric vehicle policy and utility programs, and corporate sustainability strategy. Prior to joining MJB&A in 1998, Brian worked on state energy and environmental policy while at the Commonwealth of Massachusetts Executive Office of Environmental Affairs. Brian holds a Bachelor's Degree in Political Science and Environmental Studies from Providence College.



**Leonardo Gelpi**  
Climate Change / GHG Management Manager  
**Eni Spa**

Leonardo Gelpi has been working in Eni, a major international Oil & Gas company, for more than 14 years. He is currently employed in the HSEQ Department, involved on Climate Change issues and GHG emissions management at corporate level. He is contributing, acting as technical Eni's representative, to the participation in several voluntary programs and partnerships related to methane management, like the Oil and Gas Climate Initiative and the Climate and Clean Air Coalition - Oil & Gas Methane Partnership.

Before joining HSEQ department, Leonardo achieved 6 years of experience in the R&D Eni department, where he was involved in several projects related to management of atmospheric pollution, modelling, and management of fugitive emissions.

Originally from Italy, Leonardo has a Master Degree in Environmental Engineering from the University of Rome.



**Melissa Adams**  
Chief Corporate Social Responsibility Officer  
**WGL Holdings/Washington Gas**

Ms. Adams formulates strategy and programs for the benefit of WGL and the communities we serve. She works to implement initiatives across all businesses that actualize corporate values and amplify brand positioning and business development while reducing risk. Key areas of focus include minimizing the effects the business has on the environment, through both internal operations and customer facing programs; promoting social objectives through philanthropy, volunteerism, and impact investing; advancing social equity and sustainability through training, real estate asset utilization, and procurement practices; and leading corporate community engagement.



**Richard Hyde**  
Director External Affairs  
**Southern Company Gas**

Richard works as the Executive Director of One Future in a loaned executive role. He has primary responsibility for the administrative functions of the group. In his role as Director of External Affairs for Southern Company Gas Richard has responsibility for the legislative and regulatory functions for the Commercial Businesses which include Fuels and Storage, Pipeline Investments and Energy Marketing. Richard has been in the natural gas industry for over 30 years, working for Panhandle Eastern and Trunkline Gas, Duke Energy, AGL Resources and Southern Company Gas. Richard has worked primarily in the state legislative arena, except for a brief stint in D.C. with Duke Energy as their primary pipeline representative.



**Vanessa Ryan**  
Senior Advisor, Shale Issues  
**Chevron Corporation**

Vanessa T. Ryan is Senior Adviser, Shale Issues at Chevron Corporation. She also serves as Chair of the Steering Committee of The Environmental Partnership, an industry group committed to continuously improving the industry's environmental performance. Previously, she was Senior Advisor for Chevron Asia-Pacific Exploration and Production, responsible for providing advice to Chevron's Asia-Pacific business on government and public affairs issues. She has served as Coordinator for Policy, Government, and Public Affairs for Chevron Vietnam in Ho Chi Minh City. Ms. Ryan joined Chevron as a Public Policy Adviser at Chevron Corporation, where she was responsible for the corporate responsibility report and advised on environmental, social, and geopolitical issues. Prior to joining Chevron she worked in social marketing firm focused on health and environment issues. She holds a Masters of Public Policy from the University of Southern California and a B.A. in Political Economy from UC Berkeley.



**Martha Yolanda Herrera Zapata**  
Project Engineer, Innovation and Technology Center (ICP- Colombian Petroleum Institute)  
**Ecopetrol**

With more than 15 years of experience in environmental solutions in the oil and gas sector, especially working with atmospheric contamination and pollution of water currents. The last 10 years she has worked in the Clean Technologies team of the Colombian Petroleum Institute (Ecopetrol's Innovation and Technology Center) in the structuring and implementation of the company's Climate Change Program and more specifically in the Greenhouse gas reduction initiatives and Methane reduction program to the integrated chain of Production, Transportation and Refining in Ecopetrol S.A.

Message

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**From:** Matthew Todd [ToddM@api.org]  
**Sent:** 12/8/2017 9:25:19 PM  
**To:** AirAction [AirAction@epa.gov]  
**CC:** Wehrum, Bill [Wehrum.Bill@epa.gov]; Gunasekara, Mandy [Gunasekara.Mandy@epa.gov]; Zenick, Elliott [Zenick.Elliott@epa.gov]; Page, Steve [Page.Steve@epa.gov]; Tsirigotis, Peter [Tsirigotis.Peter@epa.gov]; Cozzie, David [Cozzie.David@epa.gov]  
**Subject:** ATTN Docket ID Nos: EPA-HQ-OAR-2017-0346 & EPA-HQ-OAR-2010-0505  
**Attachments:** 2017 12 08 API Comments on NSPS OOOOa NODA Final.pdf

**Importance:** High

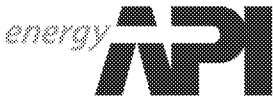
The American Petroleum Institute submitted the attached comments via [www.regulations.gov](http://www.regulations.gov) regarding the notices of data availability in support of EPA's New Source Performance Standards ("NSPS") 40 C.F.R. Part 60 Subpart OOOOa, "Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources: Stay of Certain Requirements" 82 Fed. Reg. 51,788 and 82 Fed. Reg. 51,794 (both dated November 8, 2017).

Throughout the development of the oil and gas NSPS rulemaking, API has maintained a collaborative working relationship with Agency staff to provide operational and emissions data to inform the developments of these important rules. During this time, our objective has remained the identification of cost-effective emission control requirements that reduce VOC emissions for new sources and, as a co-benefit, also reduce methane. API encourages EPA to proceed with its review and revision of the underlying rule as expeditiously as possible, based on sound science and economics, considering the operational and technical issues that have already been raised in comments and litigation. API supports extension of compliance deadlines as the Agency completes this review.

Sincerely,

Matthew Todd

Matthew Todd  
API  
202.682.8319



**Matthew Todd**  
Senior Policy Advisor

Regulatory and Scientific  
Affairs

1220 I. Street, NW  
Washington, DC 20005-4070  
USA  
Telephone 202-682-8319  
Fax 202-682-8270  
Email [toddm@api.org](mailto:toddm@api.org)  
[www.api.org](http://www.api.org)

December 8, 2017

The Honorable Scott Pruitt, Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20460

Attention: Docket ID Number EPA-HQ-OAR-2017-0346 & EPA-HQ-OAR-2010-0505  
*Submitted to the Federal eRulemaking Portal ([www.regulations.gov](http://www.regulations.gov))*

**Re: Notice of Data Availability in Support of “Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources: Stay of Certain Requirements”**

Dear Administrator Pruitt:

The American Petroleum Institute (“API”) is pleased to submit the attached comments on the notices of data availability in support of EPA’s New Source Performance Standards (“NSPS”) 40 C.F.R. Part 60 Subpart OOOOa, “Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources: Stay of Certain Requirements” 82 Fed. Reg. 51,788 and 82 Fed. Reg. 51,794 (both dated November 8, 2017).

API represents over 625 oil and natural gas companies, leaders of a technology-driven industry that supplies most of America’s energy, supports more than 9.8 million jobs and 8 percent of the U.S. economy, and, since 2000, has invested nearly \$2 trillion in U.S. capital projects to advance all forms of energy, including alternatives. Most of our members conduct oil and gas development and production operations and are directly impacted by these proposed actions.

Throughout the development of the 2012 oil and gas NSPS rule and its amendments in 2016, API has maintained a collaborative working relationship with Agency staff to provide operational and emissions data to inform the developments of these important rules. During this time, our objective has remained the identification of cost-effective emission control requirements that reduce VOC emissions for new sources and, as a co-benefit, also reduce methane. API encourages EPA to proceed with its review and revision of the underlying rule as expeditiously as possible, based on sound science and economics, considering the operational and technical issues that have already been raised in comments and litigation. API supports extension of compliance deadlines as the Agency completes this review.

Coincident with the publication of the Notices of Data Availability, EPA also published a memo entitled *Estimated Cost Savings and Foregone Benefits Associated with the Proposed Rule, "Oil and Natural Gas: Emission Standards for New, Reconstructed, and Modified Sources: Stay of Certain Requirements"*, which contains an analysis considering foregone benefits associated with social cost of methane. API is reviewing the updated analysis provided by EPA and may provide additional comments following a more detailed review.

Please contact me at [toddm@api.org](mailto:toddm@api.org) or 202-682-8319 with any additional questions regarding the content of this submittal.

Sincerely,

/s/

*Matthew Todd*

cc: Bill Wehrum, USEPA  
Mandy Gunasekara, USEPA  
Elliott Zenick, USEPA  
Steve Page, USEPA  
Peter Tsirigotis, USEPA  
David Cozzie, USEPA

**API's Comments on EPA's Notice of Data Availability in Support of "Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources: Stay of Certain Requirements"**

82 Fed. Reg. 51,788 (Nov. 8, 2017)

**Docket ID No. EPA-HQ-OAR-2010-0505, EPA-HQ-OAR-2017-0346**

In our August 2, 2016 petition, API raised specific technical issues that warrant reconsideration and review of the rule by the Agency. These issues still require attention, as do the issues raised by others, including the Independent Petroleum Association of America (IPAA), Texas Oil and Gas Association (TXOGA), and the Gas Processors Association (GPA).

On July 27, 2017, API submitted comments<sup>1</sup> to the EPA regarding the legal authorities the agency possesses to extend the relevant compliance deadlines of the Subpart OOOOa provisions. On August 8, 2017, API submitted comments further expanding on some of the technical issues and challenges industry would face and currently is facing in the absence of a targeted extension of the compliance deadlines of certain rule provisions.

As described in prior comments and as further discussed below, API believes outstanding issues support the need to provide a compliance extension while the Agency considers new information and assesses its impacts as part of the reconsideration process. While the Agency has proposed to extend the compliance dates for a targeted subset of the rule requirements for two years, there is nothing preventing the agency from reconsidering these issues, along with the other technical issues raised in API's August 2, 2016 petition, in less than two years. Going forward, the Agency should consider addressing any issues, on an expedited timeline, that can be easily addressed to provide the clarity the industry is seeking.

**1. EPA Has Authority Under the Clean Air Act To Stay Compliance Dates.**

**A. Background**

On June 3, 2016, EPA finalized new source performance standards ("NSPS") for new, reconstructed, and modified sources in the oil and natural gas sector pursuant to its authority under section 111(b) of the Clean Air Act ("CAA" or "Act"). 81 Fed. Reg. 35,823 (June 3, 2016) ("2016 NSPS Rule"). The 2016 NSPS Rule was codified at 40 C.F.R. part 60, Subpart OOOOa, and is sometimes referred to as the Quad Oa Rule. API filed petitions for reconsideration with EPA seeking administrative reconsideration of the 2016 NSPS Rule. Earlier this year, EPA granted

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<sup>1</sup> Docket ID No: EPA-HQ-2010-0505-10577

reconsideration of four narrow issues in the 2016 NSPS Rule: (1) the fugitive emission requirements for low production well sites; (2) the process related to the alternative means of emission limitations (“AMEL”) for fugitive emission requirements; (3) the standards of performance for pneumatic pumps at well sites; and (4) the requirements for certification by a professional engineer. 82 Fed. Reg. 25,730-31 (June 5, 2017). EPA also granted a three-month stay, pursuant to section 307(d)(7)(B) of the CAA, of the following three requirements in the 2016 NSPS Rule: (1) the fugitive emissions requirements (also referred to as leak detection and repair); (2) the standards of performance for pneumatic pumps at well sites; and (3) the requirements for certification by a professional engineer. *Id.* at 25,732.

In addition to the three-month stay, EPA issued a proposed rule staying compliance dates for these portions of the 2016 NSPS Rule. 82 Fed. Reg. 27,645 (June 16, 2017) (“Proposed Rule”). API filed comments in support of the Proposed Rule on July 27, 2017. American Petroleum Institute, Legal Comments on EPA’s Proposed Rule (July 27, 2017), EPA-HQ-OAR-2010-0505-10577 (“API Comments”). On November 8, 2017, EPA issued a notice of data availability (“NODA”) that explains in further detail the legal basis for the Proposed Rule. 82 Fed. Reg. 51,788 (Nov. 8, 2017). As EPA notes, it possesses the legal authority under sections 111(b) and 301(a)(1) of the CAA to amend the compliance deadlines in the 2016 NSPS Rule through “phase-in” periods. *Id.* at 51,791 (identifying both section 111 and section 301 as providing legal authority for the Proposed Rule); *see also* API Comments at 3-6, 12-14.

**B. Section 111 of the CAA Provides the Agency With Authority To Extend the Relevant Compliance Deadlines Through Phase-In Periods.**

As the NODA explains, EPA has authority under section 111 of the CAA to extend or “phase-in” the relevant compliance dates in the 2016 NSPS Rule. EPA issued the 2016 NSPS Rule under section 111(b)(1)(B) and can, as it notes, use the “same statutory authority” to extend the relevant compliance deadlines in the rule. 82 Fed. Reg. at 51,789. EPA correctly notes that agencies have inherent authority to revise or reconsider prior decisions, including “the appropriate length of the phase-in periods provided in the 2016 Rule for specific requirements, as well as whether to provide one for phasing in an additional compliance assurance measure.” *Id.* at 51,790. Under this authority, EPA proposes to “extend the current phase-in periods for the fugitive emissions requirements and well site pneumatic pump requirements, as well as providing one for the requirement for certification of closed vent systems by a professional engineer.” *Id.*

As discussed further below, section 111 allows EPA to establish a reasonable compliance period after the effective date of a rule and does not restrict how EPA can set compliance dates for



NSPS. Further, the statute does not proscribe when compliance must be obtained when EPA conducts a voluntary, ahead-of-schedule review of NSPS, as EPA did with the 2016 NSPS Rule.

EPA has authority under the plain language of section 111(b) of the CAA to extend compliance deadlines. Standards of performance are effective upon promulgation. 42 U.S.C.

§ 7411(b)(1)(B). Under the Act, however, a rule's effective date can differ from its compliance dates. For example, section 112(i) has separate, specific instructions for when a rule becomes effective *and* when compliance is required. *Id.* § 7412(i). This demonstrates that Congress does not consider the terms "effective date" and "compliance date" to be synonymous. *See id.*

§ 7412(d). Section 111 specifies when a rule must be effective but, unlike section 112, does not state when regulated sources must achieve compliance with NSPS. Consequently, EPA has discretion to establish reasonable compliance dates that are after the effective date of NSPS.

In the NODA, EPA states that it can "extend the current phase-in periods for the fugitive emissions requirements and well site pneumatic pump requirements" and establish a phase-in period "for certification of closed vent systems by a professional engineer," because agencies have inherent authority to revise or reconsider prior decisions. 82 Fed. Reg. at 51,790. As a reasonable exercise of its ability to revise rules and reconsider its decisions, the Agency may decide to revise "the appropriate length of the phase-in periods provided in the 2016 [NSPS] Rule for specific requirements, as well as whether to provide one for phasing in an additional compliance assurance measure. . . ." <sup>2</sup> *Id.*

EPA also has discretion to establish phase-in periods here because the 2016 NSPS Rule was the result of EPA's voluntary rulemaking, not the statutorily-required 8-year review of the oil and gas NSPS. Section 111(b)(1)(B) requires EPA to review the NSPS for each source category every 8 years, unless "such review is not appropriate in light of readily available information on the efficacy" of the NSPS. 42 U.S.C. § 7411(b)(1)(B). In 2011, EPA conducted this required review of the oil and gas NSPS and issued a proposed rule to revise the NSPS. 76 Fed. Reg. 52,738, 52,740-41, 52,754 (Aug. 23, 2011). In 2012, EPA issued a final revised NSPS based on its statutorily-required review. 77 Fed. Reg. at 49,490. The next 8-year review was not required until at least 2020, but EPA voluntarily reviewed the NSPS early, issuing the 2016 NSPS Rule

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<sup>2</sup> EPA has used this approach in several other NSPS rules, as API noted in its comments on the Proposed Rule. API Comments at 5. EPA included future compliance deadlines in a 2012 NSPS rule for the oil and gas sector and in at least two other rules. *See* 77 Fed. Reg. 49,490, 49,517-19 (Aug. 16, 2012) (establishing phased requirements for reduced emissions completions equipment based on availability and cost considerations); *id.* at 49,500, 49,525-26 (establishing a one-year phase-in period for storage vessel controls); 70 Fed. Reg. 28,606 (May 18, 2005) (establishing mercury standards under section 111 for coal-fired electric utility steam generating units using a two-step compliance program); 73 Fed. Reg. 3568 (Jan. 18, 2008) (finalizing NSPS for stationary spark ignition internal combustion engines that included delayed compliance dates).

years ahead of the statutory deadline. Thus, extending or phasing-in the relevant compliance deadlines for the 2016 NSPS Rule does not result in an extension of the statutorily-mandated schedule for 8-year review of these NSPS.

Further, EPA asserts it has discretion to issue new standards of performance regardless of the timing of the 8-year review. 82 Fed. Reg. at 51,789 (“EPA has discretion under CAA section 111(b)(1)(B) to add new standards of performance for additional pollutants or emission sources not previously covered concurrent with, or independent of, the 8-year review.”); *id.* at 51,790 (“[T]here is no reason that the EPA’s authority and discretion to promulgate such standards should be constrained by the timing of the 8-year review. The EPA, therefore, reasonably interprets CAA section 111(b)(1)(B) to allow the Agency to exercise its discretion to promulgate new performance standards for additional sources or pollutants when appropriate (concurrent with or independent of the 8-year review).”). EPA states it issued the 2016 Rule under this authority. *Id.* at 51,790. In such circumstances, EPA has discretion to establish phase-in requirements.<sup>3</sup>

**C. Section 301(a) of the CAA Also Provides Additional Legal Support for the Proposed Rule.**

In the NODA, EPA reasonably and lawfully identifies section 301(a) of the CAA as supplemental authority for its proposed phase-in of compliance deadlines for the 2016 NSPS Rule. EPA accurately notes the “broad rulemaking authority” it has under section 301. 82 Fed. Reg. at 51,790-91 (discussing section 301 case law and explaining that it justifies “phase-in” periods here). Section 301 grants EPA authority to issue “such regulations as are necessary to carry out” its obligations under the Act. 42 U.S.C. § 7601(a)(1).

API agrees with EPA’s explanation in the NODA that it is necessary for EPA to extend these deadlines to carry out its obligations under the CAA. As EPA explained, a “phase-in” is necessary for the fugitive emission requirements because without it, “regulated entities would incur significant and potentially unnecessary additional costs and compliance burden to implement the 2016 Rule, and, in some cases, at the expense of disrupting or complicating compliance with applicable state programs, just to later revert back to what they were doing in the first place.” 82 Fed. Reg. at 51,791. EPA promulgated the AMEL in the 2016 NSPS Rule to avoid these very problems. *Id.* As such, EPA is correct that “it is not clear that the marginal

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<sup>3</sup> API also notes EPA’s alternative authority under section 111 to establish future effective dates based on its determination of the best system of emission reduction, which was discussed in more detail in API’s comments on the Proposed Rule. API Comments at 4-5.

additional emission reductions achieved during the EPA's reconsideration process outweigh the potential disruption to existing state programs and company-specific programs." *Id.*

Regarding the well site pneumatic pump requirements, EPA explains that some sources require greater clarity regarding the definition of "greenfield site" in the technical infeasibility exemption and that this provision places sources experiencing actual technical infeasibility at risk of being in noncompliance. As such, "[d]elaying these requirements until the EPA resolves this potential problem through its reconsideration process is consistent with the 2016 [NSPS] Rule to require emission reductions from well site pneumatic pumps only where it is technically feasible to do so." *Id.* EPA also notes that it is necessary for EPA to phase-in the closed vent certification requirement for a professional engineer because "EPA had not considered its cost and whether the additional assurance justifies such expenditure," which is contrary to "section 111 of the CAA, which expressly identifies cost as a factor for consideration when promulgating emission standards." *Id.*

API agrees that all of the requirements of section 301 are met here. EPA's section 301 authority is broad and addresses when regulations are necessary to carry out EPA's duties under the Act. *See, e.g., NRDC v. EPA*, 22 F.3d 1125, 1148 (D.C. Cir. 1994) (agreeing that EPA had authority under section 301 to issue binding basic inspection and maintenance programs rules); *Specialty Equipment Market Ass'n v. Ruckelshaus*, 720 F.2d 124, 138 (D.C. Cir. 1983) (holding that EPA had authority under section 301 to create a reimbursement scheme for vehicle manufacturers "even though the statute does not specifically authorize such a scheme"); *Citizens To Save Spencer Cty. v. EPA*, 600 F.2d 844, 873 (D.C. Cir. 1979) (upholding EPA's use of rulemaking, on the basis of section 301(a)(1), to resolve a conflict between two provisions of the Act).

EPA may use section 301 of the CAA when necessary, provided that Congress has not written a "clear impediment to the issuance" of a regulation, *NRDC v. EPA*, 22 F.3d at 1148, or no other "statutory language on point" exists, *NRDC v. EPA*, 749 F.3d 1055, 1063 (D.C. Cir. 2014).

Nothing in the CAA (or any other statute) bars EPA from using its authority under section 301(a)(1) in this instance. *See id.* Section 307(d) of the CAA cannot be deemed a more specific provision because that provision applies only to mandatory reconsideration proceedings, and EPA's reconsideration proceedings here do not meet the criteria for mandatory reconsideration. *See Clean Air Council v. Pruitt*, 862 F.3d 1 (D.C. Cir. 2017). As such, section 307(d) does not apply here. Moreover, section 705 of the Administrative Procedure Act cannot be deemed a more specific provision because it is a portion of a different statute and therefore sheds no light on EPA's CAA rulemaking authority.

Phase-in periods are necessary for EPA to meet the statutory standard under section 111 of the CAA and respect the process enshrined in section 307 of the CAA. Specifically, it would

undermine the statutory purpose and text of section 111 for EPA to require current compliance with regulations that are duplicative of state requirements, provide little or no environmental protection, impose significant compliance costs and burdens on regulated entities, and cannot be said to constitute BSER. There is nothing in the Act that is a “clear impediment” to staying the relevant compliance dates here. *NRDC v. EPA*, 22 F.3d at 1148.

Finally, there are no statutory deadlines that prevent EPA’s use of section 301 here. As previously explained, EPA completed the required 8-year review of the NSPS in 2012, and the next review is not required until at least 2020. 42 U.S.C. § 7411(b)(1)(B). The provisions EPA proposes to stay here were promulgated in the 2016 NSPS Rule, which EPA undertook *after* it completed its required 8-year review of the oil and natural gas NSPS in 2012. By staying certain provisions of the 2016 NSPS Rule, EPA would not be circumventing this review cycle.

## **2. Support for Compliance Phase-in Extensions**

In the Notices of Data Availability for both the 3-month and 2-year stays, EPA seeks comments, data, and any other information that would help the EPA determine whether a phase-in is needed for certain Subpart OOOOa requirements and, if so, the length of such period. As stated in our August 8, 2017 letter, API believes that EPA requires additional time to address issues in the rule, but our members indicate that the most concerning issues are:

- (1) Technical problems with implementation of the rule for specific and unique operational situations that create untenable situations for meeting compliance, and
- (2) Certain requirements and associated burden on operators that provide little or no environmental benefits.

With respect to the technical problems raised in previous comments, it is noted that the problems are generally not widespread issues (e.g. delay of repair scenarios, addressing leak detection requirements in very cold environments, etc.). The fugitive emission compliance obligations were only effective for two months and the pneumatic pump requirements were effective for less than one year during the initial compliance period for Subpart OOOOa. Therefore, many of the issues raised in API’s reconsideration request and in our prior comments on the stays may not be reflected in most initial compliance reports submitted earlier this fall. However, it is also critically important to note that it is not possible to predict when applicable sources could experience the technical issues API has raised. Without a compliance extension to allow time to revise certain aspects of the rule, operators are exposed to potential non-compliance scenarios.

One example of a potential noncompliance scenario is the inability to conduct fugitive emission surveys for prolonged periods of time in cold weather environments. For example, as stated in ConocoPhillips Alaska Inc.'s letter dated December 4, 2015, temperatures on the Alaskan North Slope can remain below the acceptable range for operation of leak detection equipment for four or more consecutive months. This not only limits the periods that semi-annual surveys can be conducted at well sites located on the North Slope, but also makes it impossible to complete the initial monitoring surveys within 60 days during winter months for a new or modified well site. EPA has previously set precedent within Subpart OOOO and Subpart OOOOa to address such challenges. The rules currently allow for an exemption from LDAR in §60.5401(e) and §60.5401a(e) for natural gas processing plants located on the Alaskan North slope. Consistent with this precedent, API recommends EPA consider similar exemptions from LDAR for well sites and compressor stations on the Alaskan North Slope.

More generally, there are similar instances for other locations that experience extreme cold weather (e.g., assets in North Dakota and Wyoming) such that winter temperatures may stay below the acceptable range to operate the leak monitoring equipment throughout the initial 60 days of operations a new or modified well site. EPA recognized this challenge by providing a waiver due to cold temperatures in §60.5397a(g)(5) for compressor stations. API recommends that EPA also provide a similar waiver for well sites.

Another example is specific to the delay of repair requirements found in §60.5397a(h)(2). If specialty parts are not available and need to be ordered or if a certain repair on a specific leak would take a prolonged period of time to complete, operators could be forced to reconcile a customer demand (e.g., feed of fuel to a power plant) by restarting a compressor after an unplanned event (e.g., equipment trip) against remaining shutdown for prolonged period of time to enable the repair of what could be a very small and insignificant leak. See further discussion of such leak repair scenarios in Section 3.b. of this letter.

In our December 4, 2015 comments on the draft Subpart OOOOa rule, API expressed the need for a phase-in period for certain provisions (e.g., leak detection and repair at wells sites and compressor stations, control of pneumatic pumps, etc.) and EPA provided time for phasing-in these requirements in the final rule. While some operators may be experiencing challenges linked to the availability of resources, the primary objective for an extension of the compliance deadlines is to allow EPA enough time to address the issues on record. This includes fixing technical problems with the rule, providing clarifying language better reflecting EPA's intent, and removing or otherwise addressing requirements that were not properly considered during the notice and comment process. In parallel, this time will allow the Agency to properly consider new information and assess its impacts as part of the reconsideration process.

API encourages the Agency to work as quickly as possible to address the issues raised in the reconsideration process. While many issues can be fixed in less than 2 years, providing up to 2

years is appropriate to avoid further extension of compliance deadlines. API sees no reason that more than 2 years' time would be required.

### 3. Fugitive Emissions Requirements

#### a. 3<sup>rd</sup> Party Equipment (e.g., equipment such as meters owned by midstream operators):

As stated in API's August 8, 2017 letter, the leak monitoring and repair requirements should not apply to all equipment at a well site or compressor station regardless of ownership. As an initial matter, the potential emissions from fugitive midstream equipment at well sites are insignificant to the costs associated with establishing leak detection and repair programs. Further, based on the definition of a "well site", it can be interpreted that EPA intends the definition of a well site to apply to the producers' operations at the well site, and not ancillary equipment separately owned and maintained by third-party midstream companies. As set forth in the definition, a well site means *"one or more surface sites...constructed for the drilling and subsequent operation of any oil well, natural gas well, or injection well."* It is the producer of the well that constructs, drills and operates the well. As stated in the NODAs, this definition has resulted in "confusion as to the appropriate scope of components that are included in the definition of the well site for the fugitive emission requirements," particularly with respect to "ancillary midstream assets (e.g., meters)" that are "owned by legally distinct companies from the well site owner and operator and could have limited emissions." 82 Fed. Reg. at 51,798; 82 Fed. Reg. at 51,792

In addition, midstream operators have no way of confirming and controlling when a well site may become modified and subject to the leak detection and monitoring requirements for well sites. In §60.5365a(i)(3), the requirements that trigger modification of well sites includes any time a new well is drilled, or when an existing well is hydraulically fractured, or refractured. Midstream operators have no control over, nor advance knowledge of, when a well site operator takes actions that may constitute a modification. There are many instances where insignificant equipment owned by a midstream company, such as a meter run, is located at a well site along with equipment owned and operated by the producer. There are legal and logistical issues that can prevent the midstream operator from being able to comply with Subpart OOOOa for that small piece of equipment based on actions made by another operator. This presents significant practical issues with renegotiating contractual obligations on the thousands of sites<sup>4</sup> that may eventually be impacted by these requirements, particularly as facilities are modified over time. It is not a reasonable expectation that these arrangements can readily provide for these circumstances.

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<sup>4</sup> At least one member company has hundreds of locations currently affected and another member company estimates thousands of locations will eventually be affected as sites are modified.

API recommends EPA provide clarification that midstream equipment are not part of the definition of a well site, and the requirements were intended to be applicable to the well site operator only.

#### **b. Delay of Repair**

As API commented in our August 8, 2017 letter, while the concept of delayed repair is appropriate and necessary, the current rule language describes events that may not present safe conditions to perform leak repair. The delay of repair provisions as written do not reflect the realities of well site and compressor station operation, where blowdowns can occur as part of standard operations to prevent safety concerns. Unscheduled and emergency shutdowns occur from time to time, and can last a very short time before service is returned. As written, the rule requires operators to make repairs following a blowdown or during an unscheduled or emergency shutdown and this requirement does not allow adequate time to make certain repairs that require specialty parts, logistical prearrangements, skilled labor, etc. Specialty parts are sometimes required to be ordered from the manufacturer and may take longer than 30 days to arrive, which creates an untenable situation for completing the repair within 30 days in absence of a delay of repair provision specific to parts availability. This is especially a concern for locations on the Alaska North Slope that contain custom parts designed for the Arctic environment.

While these situations will occur infrequently and most repairs will be completed expeditiously, operators must have flexibility to delay repair when warranted. Although such situations are expected to be uncommon, the rule requirements have the potential to lead to prolonged shutdowns that could last days or weeks. For example, during the recent hurricane events in Texas and Florida, certain compressor stations experienced emergency shutdowns that were unplanned. If a compressor station was subject to Subpart OOOOa and had previously identified a leak that was on delay of repair, at least a portion of the compressor station (where the leak is occurring) would have had to remain offline for additional time until the leak could be repaired per the current requirements. Coordinating such repair during such a natural disaster event, especially if a specialty part is required to complete repair for a fugitive emission source, is not reasonable and the impacts and cost impacts of such a scenario were certainly not considered by EPA during the rulemaking process.

In some cases, such as on the Alaska North Slope and northern areas of the lower 48 states, the shutdown of a facility or a group of facilities in the winter can pose significant risks, including potentially the lack of primary electricity generation and space heating, and the potential for idle flow lines to gel or freeze. Backup diesel power generation is available only in limited capacities, and has higher emissions than gas turbines. In such extreme cases, bringing critical facilities back on line should not be delayed for relatively minor repairs for fugitive emissions.

The rule should allow for such overriding considerations and not put the operator in a position of having to elect between regulatory compliance and prudent facility operations.

Additionally, the language in §60.5397a(h)(2) presumes that various compressor station shut down events and well shut-ins would necessarily result in the blow down of all equipment located on site (including the component on delay of repair). This is not accurate. For example, some equipment on site may remain isolated, but under pressure (such as the line pressure of the site). As written, the rule language could be interpreted to mean that all equipment must be depressurized during a shutdown in order to repair the fugitive leak. In such circumstances, the emissions from forcing blow down of all equipment can be greater than the emissions associated with the component leaking on delay of repair.

There are several instances where a well is shut in automatically or manually for a very short period of time before production is restarted. Specifically, there are many well sites that have a flash gas compressor on site to collect gas from a low pressure separator or have a VRU that collects flash gas from storage tanks. These units compress the gas to a pressure sufficient to get the gas into a sales line. Depending on the remoteness of the well site and other factors, some operators will configure the equipment instrumentation so that when a flash gas compressor and/or a VRU trips offline, the well is automatically shut-in to prevent a short-term release of gas from pressure relief valves. A well could also be shut-in due to an emergency of some type, a fault in instrumentation, or a power outage. In most of these cases, the process equipment is not depressurized so that the well can be brought back into production and normal operations resumed as quickly as possible. If a fugitive component on delay of repair located at a well site with this type of configuration would need to be repaired prior to restart, it could result in the blowdown of pressurized equipment in order to fix a potentially small leak. This can result in significant cost to the operator due to lost revenue for a very small benefit, if any, to the environment considering the potential need to blowdown equipment for the repair.

API does not believe EPA's intent was to create such scenarios described and recommends the Agency provide clarification related to the delay of repair provisions to mitigate these technical, safety, and environmental issues.

API encourages the Agency to work as quickly as possible to address the issues raised in the reconsideration process. While many issues can be fixed in less than 2 years, providing up to 2 years is appropriate to avoid further extension of compliance deadlines. API sees no reason that more than 2 years' time would be required.

### **c. Alternative Means of Emission Limitation Provisions**

Adherence to the Clean Air Act Section 111(h) outlines the procedures for Alternative Means of Emission Limitation (AMEL) work practices, which includes a process that is labor intensive, time consuming and provides little incentive for operators to participate. As API stated in our August 8, 2017 letter, the AMEL provisions included in the rule are not sufficiently clear to facilitate effective application and approval of AMEL, and therefore fail to serve their intended



purpose. The ability to apply for and obtain AMEL for fugitive emissions requirements determines whether operators of well sites and compressor stations, in particular those subject to existing state programs or those which have invested in emerging technology, must redirect or expend additional resources and efforts to implement the 2016 Rule's fugitive emissions requirements. This is negatively impacting and complicating compliance with applicable state programs and will hinder progress in using emerging technology - all while providing little to no incremental environmental benefit.

API agrees the Agency requires additional time to review the proposed AMEL process and reduce burden for Industry where duplicative requirements occur or where emerging technology has been identified.

#### **4. Pneumatic Pumps**

##### **a. Greenfield sites**

As stated in API's August 8, 2017 letter, pneumatic pumps at "greenfield" well sites are not currently eligible to claim technical infeasibility associated with the control of an affected pneumatic pump. Due to lack of clarity regarding EPA's intent, the current rule language puts operators into a potentially untenable situation. This occurs if regulatory authorities interpret a "greenfield" well site as synonymous with "new" for Subpart OOOOa, thereby removing future technical infeasibility determinations for the entire life of a well site. It is unclear if a well site remains a greenfield site for the entire life of the well or only for a short period of time.

Initial design for construction of a greenfield site may not require installation of a pneumatic pump or a control device for the early operational period of a well site. At some point later in the life of a well (which could be years), site design requirements may change where a new control and/or pump is installed and a technical infeasibility determination is justified but not available if the site is considered greenfield throughout the life of the site. Further, even for a new site, process or control device design requirements may not be compatible with controlling pneumatic pump emissions.

Some examples include the following:

- A new site contains equipment owned and operated by two different entities and the owner/operator of an affected pneumatic pump is not the owner/operator of a control device located at the same site. For instance, a dehydration unit owned and operated by the gathering company could have a control device, but the well site owner or operator cannot route the pump emissions to the gathering company's control device.
- A new site design only requires installation of a high pressure flare to handle emergency and maintenance blowdowns. It may not be technically feasible for a low pressure pneumatic pump discharge to be routed to a high pressure flare. In addition, the flare

or other combustion device may have a rated heat capacity that would be exceeded if the discharge of pump were to be sent to it.

- Another and likely more common example would be if a new greenfield site design calls for installation of a pneumatic diaphragm pump but no control device is present. Only a process heater or boiler is present at the facility. The design and operation of a given pneumatic pump and co-located process heater or boiler may not be compatible. The heater and boiler will be designed based on the process it needs to support without regard to the additional capacity or operational need to control a pneumatic pump. More specifically, due to the small size (generally 125,000 Btu per hour to 2.5 mmBtu per hour) of many heaters or boilers used at well sites, burner capacity may be insufficient to compensate for emission combustion of additional large pneumatic diaphragm pump discharge and may result in frequent safety trips and burner flame instability (i.e., high temperature limit shutdowns, loss of flame signal, etc.). Additionally, industry guidelines (i.e., NFPA 86) would prohibit the use of boilers or heaters as control devices where the following criteria are not met: the operating temperature must be a minimum of 1400°F, emission source safety interlocks, etc.

EPA can address the greenfield issues by providing clarification that allows for technical infeasibility determinations at all well sites (and not just at non-greenfield sites). Additionally, EPA should clarify that heaters and boilers are not considered control devices with respect to pneumatic device provisions under Subpart OOOOa. It is noted that additional time to phase in the requirements as written will not address the issues API has raised. Rather, the time will allow for EPA to appropriately review and provide clarifications.

## **5. Professional Engineer Certifications**

Under current rule provisions, many companies face additional costs and project delays for a third-party Professional Engineer (PE) to design and certify closed vent systems and/or certify technical infeasibility associated with control of a pneumatic pump. As an update to our prior comments, API members report costs from \$2,000 - \$9,000 per certification; with actual cost dependent on the site complexity and thus the amount of engineering design time involved.

Some challenges experienced by operators include the following:

- Multiple member companies have had difficulty finding professional engineers willing to certify the design based on the certification statement included within the rule. Engineers were concerned with the liability of the statement and whether they had sufficient insurance or bonding to cover such a certification.
- At least one state, Wyoming, is taking a position that PE certifications for sources located in that state must be completed by a PE registered in Wyoming. While EPA indicated that this was not their intent, EPA failed to determine how state regulations or

practices might result in such situations. This new, unanticipated additional burden is not trivial and can result in material cost and schedule impacts on operators.

- At least one member company has experienced additional burden with obtaining the PE certification for a new tank installed at an existing facility. In this instance, the third-party consultant would not certify the closed vent system (CVS) individually, since this specific contractor did not originally design the entire facility-wide system. While the CVS system met engineering best practices, the certification could not be provided since this professional engineer was not willing to certify only a portion of the overall process operations / system.
- Since certification is on the design specifications of the facility and not necessarily only the CVS, any alteration at the facility must be re-reviewed, no matter how material the change may be to the operation of the CVS. Therefore, costs incurred to maintain PE certifications are generally ongoing and not a one-time expense.

A technical assessment of a closed vent system by a qualified person is an appropriate action for compliance assurance of the emission standards for storage vessels, compressors and pneumatic pumps. However, the certification requirement to have the assessment performed by a licensed Professional Engineer presents additional challenges and unintended costs than EPA considered when finalizing these requirements. Meanwhile, the PE certification process does not add significant environmental benefit to the rule provisions since there are provisions in place for ongoing compliance specific to the operation of closed vent systems, a general duty for all operators to minimize environmental impacts, and annual report submittals must be approved by a certifying official.

Therefore, API recommends EPA clarify that technical assessments can be performed by a qualified person in oil and gas facility design and does not require additional certification by a licensed Professional Engineer for both CVS and for the technical infeasibility assessment associated with control of a pneumatic pump.

Message

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**From:** Nolan, Robert M [robert.m.nolan@exxonmobil.com]  
**Sent:** 5/23/2018 3:08:18 PM  
**To:** Wehrum, Bill [Wehrum.Bill@epa.gov]  
**Subject:** ExxonMobil Press Release  
**Attachments:** ExxonMobil Release - EMBARGOED Until 8 AM CDT 05-23-2018.pdf

Good morning Bill ... I thought you might find this of interest ....

Regard, Robert

202-862-0203 (Office)  
202-302-8665 (Cell)

**EMBARGOED UNTIL 8 AM CDT, WEDNESDAY, MAY 23, 2018**

## *News Release*

**ExxonMobil**

Exxon Mobil Corporation  
5959 Las Colinas Boulevard  
Irving, TX 75039-2298  
972 940 6007 Telephone  
972 940 6143 Facsimile

CONTACT: ExxonMobil Media Relations  
(972) 940-6007

**EMBARGOED UNTIL 8 AM CDT, WEDNESDAY, MAY 23, 2018**

### **ExxonMobil Announces Greenhouse Gas Reduction Measures**

- Methane emissions to drop 15 percent, flaring reduced by 25 percent by 2020
- Improving industry-leading energy efficiency in refining and chemical manufacturing

IRVING, Texas – ExxonMobil today announced greenhouse gas reduction measures that are expected to lead to significant improvements in emissions performance by 2020, including a 15 percent decrease in methane emissions and a 25 percent reduction in flaring. The company also announced its intention to improve its industry-leading energy efficiency in refining and chemical manufacturing facilities.

ExxonMobil invests in lower-emission energy solutions such as cogeneration, flare reduction, energy efficiency, biofuels, carbon capture and storage and other technologies. ExxonMobil has spent more than \$9 billion on lower-emission energy solutions since 2000.

“We have a longstanding commitment to improve efficiency and mitigate greenhouse gas emissions,” said Darren W. Woods, chairman and chief executive officer. “Today’s announcement builds on that commitment and will help further drive improvements in our business.”

ExxonMobil is undertaking a number of initiatives to significantly reduce methane emissions. XTO Energy’s leak-detection-and-repair efforts and operational improvements at U.S. production and midstream sites have reduced estimated methane emissions across ExxonMobil operations by 2 percent in the past year. Combined with additional measures outside the U.S. focused on the most significant sources of methane, ExxonMobil expects to achieve a 15 percent reduction of methane emissions by 2020 compared with 2016.

ExxonMobil is one of eight global energy companies that supports guiding principles on methane reduction. The principles focus on continually reducing methane emissions, advancing strong performance across gas value chains, improving accuracy of methane emissions data and advocating sound policies and regulations on methane emissions. ExxonMobil is a founding member of the API’s Environmental Partnership, which is focused initially on reducing methane and volatile organic compound emissions.

Efforts associated with oil and gas production and processing are expected to lower natural gas flaring across ExxonMobil operations by about 25 percent by 2020 compared with 2016. The most significant reductions are expected to occur in operations in West Africa and include use of third-party infrastructure.

ExxonMobil is a charter member of the Global Gas Flaring Reduction Public-Private Partnership, which is committed to developing commercial opportunities to reduce flaring. The partnership is comprised of oil-producing countries, international and state-owned oil companies and the World Bank.

Further greenhouse-gas emissions reduction efforts will target ExxonMobil's global refining and chemicals manufacturing network with the goal of improving existing industry-leading energy efficiency performance.

ExxonMobil is the most energy efficient refining company in the U.S. and internationally. The company has achieved a 10 percent improvement in energy efficiency across its global refining operations following an effort launched in 2000. ExxonMobil refining operations ranked in the first quartile for energy efficiency in every Solomon Refining Industry Survey over the past decade. Advanced efficiency technologies and techniques have helped ExxonMobil's chemical business reduce its net greenhouse gas emissions intensity by nearly 7 percent since 2013.

ExxonMobil remains committed to mitigating emissions from its operations and helping consumers reduce their emissions, including through efficient fuels, lubricants and lightweight plastics.

ExxonMobil continues to support research that leads to technology breakthroughs and participates in constructive dialogue on policy options.

**About ExxonMobil**

ExxonMobil, the largest publicly traded international oil and gas company, uses technology and innovation to help meet the world's growing energy needs. ExxonMobil holds an industry-leading inventory of resources, is one of the largest refiners and marketers of petroleum products, and its chemical company is one of the largest in the world. For more information, visit [www.exxonmobil.com](http://www.exxonmobil.com) or follow us on Twitter at [www.twitter.com/exxonmobil](https://www.twitter.com/exxonmobil).

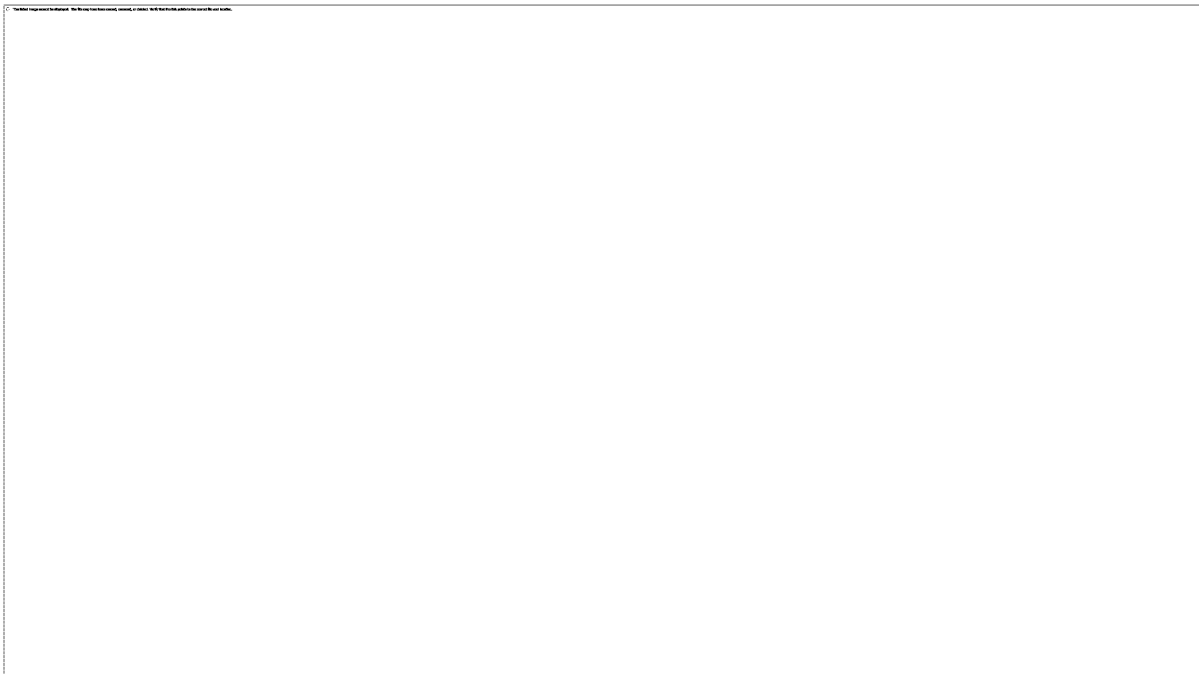
**Cautionary Statement:** Statements of future events or conditions in this release are forward-looking statements. Actual future results, including emission reductions, timing and costs and efficiency gains, could differ materially depending on political or regulatory developments; technical or operating factors; timely completion of planned projects; and other factors described under the caption "Factors Affecting Future Results" on the Investors page at [exxonmobil.com](http://exxonmobil.com).

Message

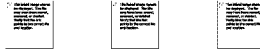
---

**From:** AF&PA Communications [comm@afandpa.org]  
**Sent:** 7/24/2018 2:00:51 PM  
**To:** Wehrum, Bill [Wehrum.Bill@epa.gov]  
**Subject:** Available Now: 2018 AF&PA Sustainability Report

[View this email in your browser](#)



Visit our [dedicated microsite](#) to download your copy of the 2018 AF&PA Sustainability Report.



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You are receiving this email because you were sent a copy of AF&PA's 2018 Sustainability Report.

**Our mailing address is:**

American Forest & Paper Association

1101 K St NW Ste 700

Washington, DC 20005-7033

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You can [update your preferences](#) or [unsubscribe from this list](#).



## Message

**From:** Brian Jones [bjones@mjbradley.com]  
**Sent:** 6/15/2018 2:06:15 PM  
**To:** Gergana Vasileva [GVasileva@thecwcgroup.com]; Martha Yolanda Herrera Zapata [martha.herrera@ecopetrol.com.co]; Adams, Melissa E [MelissaAdams@washgas.com]; Ryan, Vanessa A [vanessa.ryan@chevron.com]; Hyde, Richard [RIHYDE@southernco.com]; Gelpi Leonardo [Leonardo.Gelpi@eni.com]; Wehrum, Bill [Wehrum.Bill@epa.gov]  
**CC:** Pryor, Justin [Pryor.Justin@epa.gov]; Sarah Sandison [ssandison@thecwcgroup.com]; Sawyer, Cheryl [sawj@chevron.com]; DeLuca, Isabel [DeLuca.Isabel@epa.gov]  
**Subject:** RE: 27th World Gas Conference - Moderator Introduction - The Role of Voluntary Action in Methane Management (Friday June 28, 2018)

Thank you Gergana!

Hi Everyone,

I am looking forward to the WGC and our panel on the Friday June 29.

My contact information is below. Please contact me direct with any questions you may have.

I will reach out individually to each of you to discuss your presentation. If we can find a time to have a call together, we can do that as well.

Thanks,

Brian

\_\_\_\_\_  
 Brian M. Jones  
 Senior Vice President  
 M.J. Bradley & Associates, LLC  
 47 Junction Square Drive  
 Concord, MA 01742  
 Office: 978-405-1269 | Mobile: 508-496-7807  
[www.mjbradley.com](http://www.mjbradley.com)



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---

**From:** Gergana Vasileva [mailto:GVasileva@thecwcgroup.com]  
**Sent:** Friday, June 15, 2018 9:46 AM  
**To:** Martha Yolanda Herrera Zapata <martha.herrera@ecopetrol.com.co>; Adams, Melissa E <MelissaAdams@washgas.com>; Ryan, Vanessa A <vanessa.ryan@chevron.com>; Hyde, Richard <RIHYDE@southernco.com>; Gelpi Leonardo <Leonardo.Gelpi@eni.com>; Wehrum.Bill@epa.gov; Brian Jones <bjones@mjbradley.com>  
**Cc:** pryor.justin@epa.gov; Sarah Sandison <ssandison@thecwcgroup.com>; Sawyer, Cheryl <sawj@chevron.com>; DeLuca, Isabel <DeLuca.Isabel@epa.gov>  
**Subject:** RE: 27th World Gas Conference - Moderator Introduction - The Role of Voluntary Action in Methane Management (Friday June 28, 2018)

Dear all,

It was just brought to my attention that Brian was not included in the email below. Please accept my apologies.

Please find the biographies attached.

Best wishes,

Gergana

---

**From:** Gergana Vasileva

**Sent:** 05 June 2018 16:32

**To:** 'Martha Yolanda Herrera Zapata'; 'Adams, Melissa E'; 'Ryan, Vanessa A'; 'Hyde, Richard'; 'Gelpi Leonardo'; 'Wehrum.Bill@epa.gov'

**Cc:** [pryor.justin@epa.gov](mailto:pryor.justin@epa.gov); Sarah Sandison; Sawyer, Cheryl; 'DeLuca, Isabel'

**Subject:** 27th World Gas Conference - Moderator Introduction - The Role of Voluntary Action in Methane Management (Friday June 28, 2018)

Dear all,

In anticipation of the upcoming 27<sup>th</sup> World Gas Conference, please allow me to introduce **Brian M. Jones**, Senior Vice President, **M.J. Bradley & Associates, LLC** and the **moderator** of the Workshop session **The Role of Voluntary Action in Methane Management** which will take place on **Friday June 29, 2018** from **10:20 AM – 11:40 AM**.

The Workshop session is **1 hour 20 minutes in duration**. The session will commence with Brian introducing the session topic and each speaker. Each speaker will then have **8-10 minutes to deliver their presentation** and then return to their seat on stage. The session will conclude with audience Q&A.

The session will be made up of:

- **Opening Remarks: Bill Wehrum**, Assistant Administrator, Office of Air and Radiation, **U.S. Environmental Protection Agency (EPA)**
- **Leonardo Gelpi**, Climate Change / GHG Management Manager, **Eni Spa**
- **Melissa Adams**, Chief Corporate Social Responsibility Officer, **WGL Holdings/Washington Gas**
- **Richard Hyde**, Director External Affairs, **Southern Company Gas**
- **Vanessa Ryan**, Senior Advisor, Shale Issues, **Chevron Corporation**
- **Martha Yolanda Herrera Zapata**, Project Engineer, Innovation and Technology Center (ICP- Colombian Petroleum Institute), **Ecopetrol**.

**Please find the attached copies of all speaker biographies for your reference.**

If you have any questions regarding the points for discussion in the panel please do not hesitate to contact Brian.

Should you also wish to discuss the content further in a phone call, please do let me know and I will be more than happy to assist in setting this up.

I look forward to meeting you at the conference.

Best wishes,

Gergana

Gergana Vasileva

Speaker and Program Assistant, WGC 2018

CWC Solutions, part of CWC Group Limited

Direct Line: +44 20 79780064 w: [www.cwc-solutions.com](http://www.cwc-solutions.com)

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CWC Group Limited Registration - 3410466

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## Message

**From:** Gergana Vasileva [GVasileva@thecwcgroup.com]  
**Sent:** 6/15/2018 1:42:00 PM  
**To:** Martha Yolanda Herrera Zapata [martha.herrera@ecopetrol.com.co]; Adams, Melissa E [MelissaAdams@washgas.com]; Ryan, Vanessa A [vanessa.ryan@chevron.com]; Hyde, Richard [RIHYDE@southernco.com]; Gelpi Leonardo [Leonardo.Gelpi@eni.com]; Wehrum, Bill [Wehrum.Bill@epa.gov]; Brian Jones [bjones@mjbbradley.com]  
**CC:** Pryor, Justin [Pryor.Justin@epa.gov]; Sarah Sandison [ssandison@thecwcgroup.com]; Sawyer, Cheryl [sawj@chevron.com]; DeLuca, Isabel [DeLuca.Isabel@epa.gov]  
**Subject:** RE: 27th World Gas Conference - Moderator Introduction - The Role of Voluntary Action in Methane Management (Friday June 28, 2018)  
**Attachments:** ATT00001.txt

---

**From:** Gergana Vasileva  
**Sent:** 05 June 2018 16:32  
**To:** 'Martha Yolanda Herrera Zapata'; 'Adams, Melissa E'; 'Ryan, Vanessa A'; 'Hyde, Richard'; 'Gelpi Leonardo'; 'Wehrum.Bill@epa.gov'  
**Cc:** pryor.justin@epa.gov; Sarah Sandison; Sawyer, Cheryl; 'DeLuca, Isabel'  
**Subject:** 27th World Gas Conference - Moderator Introduction - The Role of Voluntary Action in Methane Management (Friday June 28, 2018)

Dear all,

In anticipation of the upcoming 27<sup>th</sup> World Gas Conference, please allow me to introduce **Brian M. Jones**, Senior Vice President, **M.J. Bradley & Associates, LLC** and the **moderator** of the Workshop session **The Role of Voluntary Action in Methane Management** which will take place on **Friday June 29, 2018** from **10:20 AM – 11:40 AM**.

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- **Richard Hyde**, Director External Affairs, **Southern Company Gas**
- **Vanessa Ryan**, Senior Advisor, Shale Issues, **Chevron Corporation**
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If you have any questions regarding the points for discussion in the panel please do not hesitate to contact Brian.

Should you also wish to discuss the content further in a phone call, please do let me know and I will be more than happy to assist in setting this up.

I look forward to meeting you at the conference.

Best wishes,  
Gergana

Gergana Vasileva

Speaker and Program Assistant, WGC 2018

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## Message

**From:** Reed, Pamela F. (LDZX) [Pamela.F.Reed@p66.com]  
**Sent:** 1/25/2019 3:54:39 PM  
**To:** Wheeler, Andrew [wheeler.andrew@epa.gov]  
**CC:** Leopold, Matt (OGC) [Leopold.Matt@epa.gov]; Wehrum, Bill [Wehrum.Bill@epa.gov]; Cohen, Janet [cohen.janet@epa.gov]; Carvalho, Donna H. (LDZX) [Donna.H.Carvalho@p66.com]; McKithan, Susie A (LDZX) [Susie.A.McKithan@p66.com]  
**Subject:** CONFIDENTIAL: Notice of Intent - Phillips 66 Company (Billings Refinery)  
**Attachments:** ATT00001.txt; 2019.01.25 Notice of Intent (2nd attempt).pdf

**SENT ON BEHALF OF DONNA CARVALHO:**

For your review, attached you will find correspondence concerning the above-referenced matter.

Regards,

*Pamela Reed*

**Legal Administrative Assistant**

O: (Ex. 6) F: (+1) 832.765.9875 | [pamela.f.reed@p66.com](mailto:pamela.f.reed@p66.com)  
HQ-13-N1349-01 | P. O. Box 421959 | Houston, TX 77242-1959 | Physical Address: 2331 CityWest Blvd. | Houston, TX 77042



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**DONNA H. CARVALHO**  
Senior Counsel  
*Legal Compliance, Environmental & Regulatory*

**PHILLIPS 66 Company**  
P.O. Box 421959  
Houston, Texas 77242-1959  
Phone: (832) 765-1214  
Email: [Donna.H.Carvalho@p66.com](mailto:Donna.H.Carvalho@p66.com)



January 25, 2019

**VIA ELECTRONIC MAIL [wheeler.andrew@epa.gov](mailto:wheeler.andrew@epa.gov)**  
**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

The Honorable Andrew Wheeler  
Acting Administrator  
U.S. Environmental Protection Agency  
William Jefferson Clinton Building  
1200 Pennsylvania Avenue, N.W.  
Mail Code: 1101A  
Washington, DC 20460

Re: Notice of Intent to Sue EPA for Its Failure to Act on Small Refinery Hardship Exemption  
Petition in Accordance with Statutory Deadline

Dear Mr. Wheeler:

We attempted to deliver the above-referenced Notice to you on January 25, 2019 via UPS Overnight Delivery. However, the attempt was unsuccessful per the attached notification from UPS (*"The package was refused by the receiver and will be returned to the sender."*).

Therefore, we are making a second attempt to deliver this Notice to your office via Certified Mail – Return Receipt Requested.

Please contact me if you have any questions.

Very truly yours,

A handwritten signature in cursive script that reads "Donna H. Carvalho".

Donna H. Carvalho

Enclosures: UPS Delivery Notification  
Notice of Intent dated January 24, 2019

cc: (via email)  
Matt Leopold, EPA Office of General Counsel  
[leopold.matt@epa.gov](mailto:leopold.matt@epa.gov)

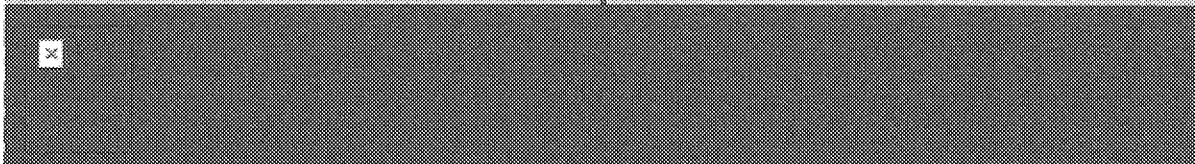
Bill Wehrum, EPA Office of Air and Radiation  
[wehrum.william@epa.gov](mailto:wehrum.william@epa.gov)

Janet Cohen, EPA Office of Transportation and Air Quality  
[cohen.janet@epa.gov](mailto:cohen.janet@epa.gov)

**Reed, Pamela F. (LDZX)**

---

**From:** UPS Quantum View <auto-notify@ups.com>  
**Sent:** Friday, January 25, 2019 7:32 AM  
**To:** Reed, Pamela F. (LDZX)  
**Subject:** [EXTERNAL]UPS Exception Notification, Tracking Number 1ZE9644X0197476769

**The status of your package has changed.**

**Exception Reason:** The package was refused by the receiver and will be returned to the sender.

**Exception Resolution:** The package will be returned to the sender.

At the request of PHILLIPS 66-HOUSTON LEGAL, this notice alerts you that the status of the shipment listed below has changed.

**Shipment Details**

---

<b>Tracking Number:</b>	<u>1ZE9644X0197476769</u>
<b>Ship To:</b>	USEPA 1200 Pennsylvania Avenue, N.W. Mail Code 1101A Acting Administrator WASHINGTON, DC 204600001 US
<b>UPS Service:</b>	UPS NEXT DAY AIR
<b>Package Weight:</b>	0.0 LBS
<b>Reference Number 1:</b>	NH 312
<b>Reference Number 2:</b>	Carvalho (P-2019-0027)





**DONNA H. CARVALHO**  
Senior Counsel  
*Legal Compliance, Environmental & Regulatory*

**PHILLIPS 66 Company**  
P.O. Box 421959  
Houston, Texas 77242-1959  
Phone: (832) 765-1214  
Email: [Donna.H.Carvalho@p66.com](mailto:Donna.H.Carvalho@p66.com)



January 24, 2019

**VIA ELECTRONIC MAIL [wheeler.andrew@epa.gov](mailto:wheeler.andrew@epa.gov)**  
**AND UPS OVERNIGHT DELIVERY**

The Honorable Andrew Wheeler  
Acting Administrator  
U.S. Environmental Protection Agency  
William Jefferson Clinton Building  
1200 Pennsylvania Avenue, N.W.  
Mail Code: 1101A  
Washington, DC 20460

Re: Notice of Intent to Sue EPA for Its Failure to Act on Small Refinery Hardship  
Exemption Petition in Accordance with Statutory Deadline

**THIS DOCUMENT CONTAINS CONFIDENTIAL BUSINESS INFORMATION.**

Dear Mr. Wheeler:

I am writing on behalf of Phillips 66 Company (the "Company"), which, on May 2, 2018, submitted a petition asking the U.S. Environmental Protection Agency ("EPA") to exempt the Company's Billings Montana Refinery (EPA facility IDs 01350 and 82185) from certain requirements established under the Renewable Fuels Standard ("RFS") Program for the 2017 compliance year. The Billings Refinery is a small refinery under the RFS program and may at any time petition EPA for an RFS exemption by showing that it would face "disproportionate economic hardship" under the program. 42 U.S.C. § 7545(o)(9)(B)(i).

Under 42 U.S.C. § 7545(o)(9)(B)(iii), EPA is required to act on small refinery exemption petitions within 90 days of receiving them, but our petition has been pending at EPA for more than 250 days. In accordance with section 304(b) of the Clean Air Act, 42 U.S.C. § 7604(b), this letter shall serve as formal notice of the Company's intent to file suit against EPA for its failure to perform its mandatory duty under the Clean Air Act to act on our small refinery exemption petition within the 90-day period prescribed by statute.

Section 304 of the Clean Air Act authorizes civil actions against the Administrator to compel him or her to perform any act or duty that is not discretionary under the Clean Air Act. 42 U.S.C. § 7604(a)(2). This letter provides the necessary notice required before such actions can be filed, which may occur sixty (60) days from the date of this letter. 42 U.S.C. § 7604(b)(2).

*The Honorable Andrew Wheeler*  
*January 24, 2019*  
*Page 2*

EPA's failure to timely act on the petition potentially harms the Company's and the Refinery's competitive position. Under EPA regulations, the Company must meet its 2018 obligation by surrendering RIN by March 31, 2019. Inaction on EPA's part limits how the Company can meet its 2018 RFS obligations. The company utilized 2017 vintage RINs to satisfy its 2017 obligation for the Billings refinery. Given the delayed action, Phillips 66 now may be forced to use 2018 vintage RINs for its 2018 compliance obligation rather than otherwise acquiring lower cost 2017 vintage RINs since the 2017 RINs expire after March 31. The uncertain status of the 2017 RINs results in potentially increased compliance costs for the company and the refinery. EPA's inaction affects approximately 80 million 2017 vintage RINS valued at roughly \$30MM. If Phillips 66 finds itself in the position that it must use 2018 vintage RINs for its 2018 compliance obligation, the financial impact of this delay will likely be significantly increased.

If the Company finds it necessary to file any such action, it will seek all appropriate relief, including injunctive, declaratory, monetary, and any other relief as may be awarded by a court of competent jurisdiction.

As noted above, the information disclosed in this letter pertaining to RIN holdings is **confidential business information** as that term is used in 40 C.F.R. Part 2, Subpart B and other EPA regulations and policies. Phillips 66 Company requests that EPA treat this letter and the information within it as confidential business information.

If you have any questions, I may be reached at the number and e-mail shown above.

Very truly yours,



Donna H. Carvalho

cc: (via email & regular U.S. Mail)  
Matt Leopold, EPA Office of General Counsel  
[leopold.matt@epa.gov](mailto:leopold.matt@epa.gov)

Bill Wehrum, EPA Office of Air and Radiation  
[wehrum.william@epa.gov](mailto:wehrum.william@epa.gov)

Janet Cohen, EPA Office of Transportation and Air Quality  
[cohen.janet@epa.gov](mailto:cohen.janet@epa.gov)

Message

---

**From:** Longworth, Jeffrey [Jeffrey.Longworth@btlaw.com]  
**Sent:** 2/26/2018 1:51:43 PM  
**To:** Lewis, Josh [Lewis.Josh@epa.gov]  
**CC:** Wehrum, Bill [Wehrum.Bill@epa.gov]; Lassiter, Penny [Lassiter.Penny@epa.gov]; Astrachan, Eric (eastrachan@tileusa.com) [eastrachan@tileusa.com]  
**Subject:** RE: Brick/Clay MACT rule reconsideration

We very much appreciate it. Can you call after 3? I'm pretty booked from noon-3. Thanks.

**Jeffrey Longworth**

Direct (202) 408-6918



---

**From:** Lewis, Josh [mailto:Lewis.Josh@epa.gov]  
**Sent:** Monday, February 26, 2018 8:43 AM  
**To:** Longworth, Jeffrey  
**Cc:** Wehrum, Bill; Lassiter, Penny  
**Subject:** RE: Brick/Clay MACT rule reconsideration

Sorry Jeffrey. Penny Lassiter (cc'd) was going to be in touch on the status of the reconsideration rulemaking. I'll give you a call later today on the meeting next week.

Josh Lewis  
Chief of Staff  
EPA/Office of Air and Radiation  
Office: 202 564 2095  
Cell: 202 329 2291

---

**From:** Longworth, Jeffrey [mailto:Jeffrey.Longworth@btlaw.com]  
**Sent:** Monday, February 26, 2018 8:34 AM  
**To:** Lewis, Josh <Lewis.Josh@epa.gov>  
**Cc:** Wehrum, Bill <Wehrum.Bill@epa.gov>  
**Subject:** RE: Brick/Clay MACT rule reconsideration

Any update? The TCNA Executive Director, Eric Astrachan, will be in town next week and would like to meet with appropriate EPA representatives if possible. Thanks

**Jeffrey Longworth**

Direct (202) 408-6918



---

**From:** Lewis, Josh [<mailto:Lewis.Josh@epa.gov>]  
**Sent:** Wednesday, February 14, 2018 4:41 PM  
**To:** Longworth, Jeffrey  
**Cc:** Wehrum, Bill  
**Subject:** RE: Brick/Clay MACT rule reconsideration

Hi Jeffrey,

I'll check in w/ folks here and get back to you.

Josh Lewis  
Chief of Staff  
EPA/Office of Air and Radiation  
Office: 202 564 2095

---

**From:** Longworth, Jeffrey [<mailto:Jeffrey.Longworth@btlaw.com>]  
**Sent:** Wednesday, February 14, 2018 11:01 AM  
**To:** Lewis, Josh <[Lewis.Josh@epa.gov](mailto:Lewis.Josh@epa.gov)>  
**Cc:** Wehrum, Bill <[Wehrum.Bill@epa.gov](mailto:Wehrum.Bill@epa.gov)>  
**Subject:** Brick/Clay MACT rule reconsideration

Josh,  
I represent the Tile Council of North America. TCNA wants to ascertain the status of the Brick/Clay MACT rule reconsideration and convey their positions regarding that matter. I've reached out to staff in OAQPS in RTP (identified in Administrator Pruitt's November 1, 2017 reconsideration letter), and have not had any success. I saw AA Bill Wehrum last week at Susan Bodine's ceremonial swearing in and he said to reach out to you if I was having trouble getting any responses. Can you tell me the status of that reconsideration rulemaking?

Bill also indicated that he had talked with but never met the Executive Director of TCNA, Eric Astrachan. Eric will be in DC the week of March 5 and would very much appreciate any opportunity to meet with Bill or appropriate staff in DC (any day except March 6, I believe).

Thank you for your time and any information regarding the status of the MACT reconsideration or opportunity to meet with EPA in early March.

Respectfully,

**Jeffrey Longworth** | Partner  
Barnes & Thornburg LLP  
1717 Pennsylvania Avenue NW, Suite 500, Washington, DC 20006-4623  
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## Message

**From:** Gergana Vasileva [GVasileva@thecwcgroup.com]  
**Sent:** 7/3/2018 11:58:20 AM  
**To:** Brian Jones [bjones@mjbradley.com]; Martha Yolanda Herrera Zapata [martha.herrera@ecopetrol.com.co]; Adams, Melissa E [MelissaAdams@washgas.com]; Ryan, Vanessa A [vanessa.ryan@chevron.com]; Hyde, Richard [RIHYDE@southernco.com]; Gelpi Leonardo [Leonardo.Gelpi@eni.com]; Wehrum, Bill [Wehrum.Bill@epa.gov]  
**CC:** Pryor, Justin [Pryor.Justin@epa.gov]; Sarah Sandison [ssandison@thecwcgroup.com]; Sawyer, Cheryl [sawj@chevron.com]; DeLuca, Isabel [DeLuca.Isabel@epa.gov]  
**Subject:** 27th World Gas Conference - Post Conference Materials  
**Attachments:** ATT00001.txt

Dear all,

It was a pleasure for me to meet you all in person! Thank you once again for your participation in the 27th World Gas Conference and I hope you all enjoyed your time in Washington DC.

I just wanted to check if you all have access to the conference materials. If you have any problems to access these or if you have any other questions, please do not hesitate to contact me!

Wish you all the best in everything you do!

Best regards,

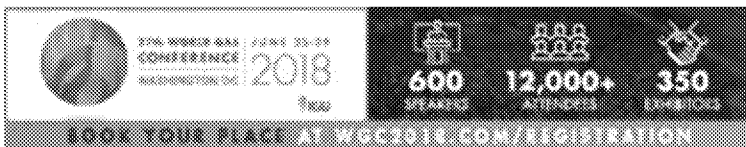
**Gergana Vasileva**

Speaker and Program Assistant, WGC 2018

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**From:** Gergana Vasileva  
**Sent:** 23 June 2018 15:17  
**To:** Brian Jones; Martha Yolanda Herrera Zapata; Adams, Melissa E; Ryan, Vanessa A; Hyde, Richard; Gelpi Leonardo; Wehrum.Bill@epa.gov  
**Cc:** pryor.justin@epa.gov; Sarah Sandison; Sawyer, Cheryl; DeLuca, Isabel  
**Subject:** RE: 27th World Gas Conference - My on-sitecontact number

Dear all,

As the 27th World Gas Conference is so close now, I hope your preparation is going well.

Please do not hesitate to contact me on my US number 667 225 9526 if you need any assistance.

I will be looking forward to meet you next week!

Best wishes,  
 Gergana

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**From:** Brian Jones [mailto:bjones@mjbradley.com]

**Sent:** 15 June 2018 10:06

**To:** Gergana Vasileva; Martha Yolanda Herrera Zapata; Adams, Melissa E; Ryan, Vanessa A; Hyde, Richard; Gelpi Leonardo; Wehrum.Bill@epa.gov

**Cc:** pryor.justin@epa.gov; Sarah Sandison; Sawyer, Cheryl; DeLuca, Isabel

**Subject:** RE: 27th World Gas Conference - Moderator Introduction - The Role of Voluntary Action in Methane Management (Friday June 28, 2018)

Thank you Gergana!

Hi Everyone,

I am looking forward to the WGC and our panel on the Friday June 29.

My contact information is below. Please contact me direct with any questions you may have.

I will reach out individually to each of you to discuss your presentation. If we can find a time to have a call together, we can do that as well.

Thanks,

Brian

---

Brian M. Jones  
Senior Vice President  
M.J. Bradley & Associates, LLC  
47 Junction Square Drive  
Concord, MA 01742  
Office: 978-405-1269 | Mobile: 508-496-7807  
[www.mjbradley.com](http://www.mjbradley.com)



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**From:** Gergana Vasileva [mailto:GVasileva@thecwcgroup.com]

**Sent:** Friday, June 15, 2018 9:46 AM

**To:** Martha Yolanda Herrera Zapata <martha.herrera@ecopetrol.com.co>; Adams, Melissa E <MelissaAdams@washgas.com>; Ryan, Vanessa A <vanessa.ryan@chevron.com>; Hyde, Richard <RIHYDE@southernco.com>; Gelpi Leonardo <Leonardo.Gelpi@eni.com>; Wehrum.Bill@epa.gov; Brian Jones <bjones@mjbradley.com>

**Cc:** pryor.justin@epa.gov; Sarah Sandison <ssandison@thecwcgroup.com>; Sawyer, Cheryl <sawj@chevron.com>; DeLuca, Isabel <DeLuca.Isabel@epa.gov>

**Subject:** RE: 27th World Gas Conference - Moderator Introduction - The Role of Voluntary Action in Methane Management (Friday June 28, 2018)

Dear all,

It was just brought to my attention that Brian was not included in the email below. Please accept my apologies.

Please find the biographies attached.

Best wishes,  
Gergana

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**From:** Gergana Vasileva

**Sent:** 05 June 2018 16:32

**To:** 'Martha Yolanda Herrera Zapata'; 'Adams, Melissa E'; 'Ryan, Vanessa A'; 'Hyde, Richard'; 'Gelpi Leonardo'; 'Wehrum.Bill@epa.gov'

**Cc:** [pryor.justin@epa.gov](mailto:pryor.justin@epa.gov); Sarah Sandison; Sawyer, Cheryl; 'DeLuca, Isabel'

**Subject:** 27th World Gas Conference - Moderator Introduction - The Role of Voluntary Action in Methane Management (Friday June 28, 2018)

Dear all,

In anticipation of the upcoming 27<sup>th</sup> World Gas Conference, please allow me to introduce **Brian M. Jones**, Senior Vice President, **M.J. Bradley & Associates, LLC** and the **moderator** of the Workshop session **The Role of Voluntary Action in Methane Management** which will take place on **Friday June 29, 2018 from 10:20 AM – 11:40 AM**.

The Workshop session is **1 hour 20 minutes in duration**. The session will commence with Brian introducing the session topic and each speaker. Each speaker will then have **8-10 minutes to deliver their presentation** and then return to their seat on stage. The session will conclude with audience Q&A.

The session will be made up of:

- **Opening Remarks: Bill Wehrum**, Assistant Administrator, Office of Air and Radiation, **U.S. Environmental Protection Agency (EPA)**
- **Leonardo Gelpi**, Climate Change / GHG Management Manager, **Eni Spa**
- **Melissa Adams**, Chief Corporate Social Responsibility Officer, **WGL Holdings/Washington Gas**
- **Richard Hyde**, Director External Affairs, **Southern Company Gas**
- **Vanessa Ryan**, Senior Advisor, Shale Issues, **Chevron Corporation**
- **Martha Yolanda Herrera Zapata**, Project Engineer, Innovation and Technology Center (ICP- Colombian Petroleum Institute), **Ecopetrol**.

**Please find the attached copies of all speaker biographies for your reference.**

If you have any questions regarding the points for discussion in the panel please do not hesitate to contact Brian.

Should you also wish to discuss the content further in a phone call, please do let me know and I will be more than happy to assist in setting this up.

I look forward to meeting you at the conference.

Best wishes,  
Gergana

Gergana Vasileva

Speaker and Program Assistant, WGC 2018

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Message

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**From:** Matthew Todd [ToddM@api.org]  
**Sent:** 7/2/2018 4:22:41 PM  
**To:** Chapman, Apple [Chapman.Apple@epa.gov]  
**CC:** Bodine, Susan [bodine.susan@epa.gov]; Wehrum, Bill [Wehrum.Bill@epa.gov]; Traylor, Patrick [traylor.patrick@epa.gov]; Sullivan, Tim [Sullivan.Tim@epa.gov]; Williams, Christopher [Williams.Christopher@epa.gov]  
**Subject:** API Comments on EPA's New Owner Audit Program for Oil and Gas Production  
**Attachments:** 2018 07 02 API Comments on EPA New Owner Audit Program Final.pdf

Dear Ms. Chapman:

API respectfully submits the attached letter in response to the U.S. EPA's request for comments on its proposed changes to the 2000 policy titled "Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations" for new owners of oil and natural gas exploration and production facilities and, in particular, the Agency's Draft Standard Audit Policy Agreement. API believes that the Audit Policy can be an important tool in furtherance of environmental compliance and hope this feedback will lead to a final program that provides a more flexible approach to eligibility and administration.

Please do not hesitate to contact me with any questions regarding the content of this submittal. We look forward to reviewing the revised draft agreement as discussed during the face-to-face meeting last Thursday, June 28<sup>th</sup>.

Regards,

Matt

Matthew Todd  
API  
202.682.8319



**Matthew Todd**  
Senior Policy Advisor

Regulatory and Scientific  
Affairs

1220 L Street, NW  
Washington, DC 20005-4070  
USA  
Telephone 202-682-8319  
Email [toddm@api.org](mailto:toddm@api.org)  
[www.api.org](http://www.api.org)

July 2, 2018

*Via Electronic Mail ([Chapman.apple@epa.gov](mailto:Chapman.apple@epa.gov))*

Apple Chapman  
Deputy Director, Air Enforcement Division  
U.S. Environmental Protection Agency  
Mail Code 2242A  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

Re: Comments of the American Petroleum Institute in Response to the Environmental Protection Agency's Draft Audit Policy Agreement for New Owners of Oil and Natural Gas Exploration and Production Facilities.

Dear Deputy Director Chapman:

This letter provides comments from the American Petroleum Institute ("API") in response to the U.S. Environmental Protection Agency's ("EPA's" or "the Agency's") request for comments on its proposed changes to EPA's 2000 policy titled "Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations" (the "Audit Policy") for new owners of oil and natural gas exploration and production facilities and, in particular, the Agency's Draft Standard Audit Policy Agreement ("Draft Agreement"). API believes that the Audit Policy is an important tool in furtherance of environmental compliance and appreciates EPA's interest in expanding its use by proposing to adopt a more flexible approach to eligibility and administration.

EPA is correct that the Audit Policy has traditionally been underutilized by new owners of oil and natural gas exploration and production facilities and has correctly identified many of the reasons why new owners of oil and natural gas exploration and production facilities have not used the Audit Policy as extensively as other industries (e.g., infeasibility of deadlines, regulatory complexity). API is concerned, however, that the approach embodied in EPA's Draft Agreement may not only fail to address these issues, it could potentially create new barriers to use of the Audit

Policy. API raised these concerns and questions with EPA in advance of, and during, EPA's stakeholder meeting on June 28, 2018. We are reiterating these concerns here in sincere hope that we will be able to work with EPA to avoid the inadvertent imposition of additional barriers to use of the Audit Policy. API and its members are committed to helping EPA expand use of the Audit Policy among new owners of oil and natural gas exploration and production facilities.

## **I. CONCERNS WITH EPA'S PROPOSED APPROACH**

API has two fundamental concerns with EPA's proposed changes to the Audit Policy. Our first concern relates to Draft Policy Agreement ("Attachment B"), which appears to require companies seeking penalty mitigation through the Audit Policy to first conduct analyses and corrective actions that are not based on any federal statutory or regulatory requirements. The Attachment B requirements are, in fact, significantly more stringent than what EPA requires under regulations promulgated pursuant to the Clean Air Act ("CAA" or "the Act").

Our second concern is with EPA's apparent intent to require new owners to navigate EPA's audit process in states that operate their own audit programs pursuant to authority delegated under the CAA. Rather than deferring to states authorized to administer the Act, EPA's proposed approach suggests that EPA will impose its own Audit Policy requirements on top of any state audit program requirements. API is concerned that this approach would lead to duplication, inconsistency, and confusion.

More fundamentally, both of these proposed changes appear more likely to further curtail – rather than expand – use of the Audit Policy by new owners of oil and natural gas exploration and production facilities. In order to help EPA avoid such an undesirable outcome, in the subsections below, we provide detailed explanations of API's concerns and recommended changes.

### **a. Attachment B Creates a Barrier to Use of the Audit Policy**

EPA's 2000 Audit Policy encourages companies to voluntarily discover potential violations through self-auditing, disclose them to the EPA, promptly correct them, and prevent their future reoccurrence. In exchange, companies receive a reduction or elimination of civil penalties and a determination by EPA not to recommend criminal prosecution to the U.S. Department of Justice.

In order to obtain penalty mitigation through the audit policy, nine conditions must be met: (1) systematic discovery through an internal or external audit or compliance management program; (2) voluntary discovery of the violation; (3) prompt disclosure to EPA within 21 days of discovery; (4) independent discovery and disclosure; (5) correction and remediation within 60 days from the date of discovery; (6) prevention of recurrence of the violation; (7) the violations are not repeat violations; (8) the violations do not result in serious actual harm, an imminent and substantial

endangerment, and do not violate an administrative or judicial order or consent agreement; and (9) cooperation by the disclosing entity.

In 2008, EPA tailored its approach to Audit Policy disclosures for “new owners.” EPA recognized that environmental audits frequently occur as part of a transfer of ownership over a property or facility. New owners, however, did not sufficiently avail themselves of the program because of uncertainty over EPA’s definition of “new owners,” apparent inapplicability of some of the policy’s conditions, and deadlines that were too short to be used in the context of a transaction. EPA’s 2008 Interim Approach to Applying the Audit Policy to New Owners (“Interim Policy”) attempted to address these issues by clarifying the eligibility for treatment as a new facility and by clarifying how four of nine Audit Policy eligibility preconditions were to be applied to new owners.<sup>1</sup>

The Interim Policy’s specific changes to the Audit Policy’s eligibility conditions are not relevant to these comments. What is relevant, however, is that the Interim Policy did not change the fundamental structure of the Audit Policy. Under either the original 2000 Audit Policy or the 2008 Interim Policy, companies are required to discover violations through self-auditing, disclose them to the EPA, promptly correct them, and prevent their future reoccurrence. In order to identify potential violations, the participating company first identifies the standards and requirements applicable to the subject facility and then examines the facility and the company’s operation of the facility to assess whether those standards and requirements have been met.

The Draft Agreement, on the other hand, would fundamentally change the structure of the Audit Policy by requiring auditing, disclosure, and corrective actions regardless of whether the company is in violation of any federal regulation under the CAA. To be perfectly clear, this approach would saddle new owners of oil and natural gas exploration and production facilities with an entirely new and onerous requirement in order to use the Audit Policy. Under proposed Attachment B, it would no longer be sufficient for new owners to identify, disclose, correct, and prevent recurrence of “specific violations.”<sup>2</sup> Instead, Attachment B would require new owners to conduct modeling, install equipment, and adopt operational and design changes even where the design and operation of the equipment complies with the New Source Performance Standards (“NSPS”) and National Emissions Standards for Hazardous Air Pollutants (“NESHAPs”) EPA promulgated for that equipment.

Indeed, Attachment B seems to provide a framework for assessing the presence of emissions and the efficacy of emissions controls without identifying the applicable standards for either. In doing

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<sup>1</sup> 73 Fed. Reg. 44,991 (August 1, 2008).

<sup>2</sup> See #4 in Audit Policy Interpretive Guidance (Jan. 1997) at <https://www.epa.gov/sites/production/files/documents/audpolintepgui-mem.pdf>

so, Attachment B seemingly creates an entirely new standard of compliance that does not bear any relationship to any federal statutory or regulatory requirement applicable to oil and natural gas exploration and production facilities. Instead, the Draft Agreement appears to require participating companies to conduct assessments and corrective actions that are required only under certain state regulations, and/or have been compelled in EPA consent decrees alleging subjective “general duty” violations under CAA Section 112(r)(1). Such assessments and corrective actions may be appropriate in specific states or in certain fact-specific circumstances, but it is not appropriate to require them on an industry-wide basis. While API recognizes that EPA is not attempting to craft new non-regulatory compliance standards for oil and natural gas exploration and production facilities, we remain concerned that Attachment B seems to provide a new industry-wide measurement of compliance that far exceeds what is required under the CAA or EPA’s regulations under the CAA.

API also recognizes that the Draft Agreement is designed to provide model language that can be tailored by participating companies and the Agency as they negotiate the provisions of specific audit agreements. Nevertheless, given the Agency’s superior leverage in negotiating an audit agreement with a company concerned about potential noncompliance, API remains concerned that putative participants in the Audit Program would not be able to negotiate away EPA’s default requirements. Again, API does not believe that EPA is attempting to use the Draft Agreement to introduce a backdoor regulation on the upstream oil and natural gas industry. We do, however, have significant questions about the propriety of assessing compliance based on standards that exceed and are entirely distinct from that which EPA has required in regulations developed through notice-and-comment rulemaking.

The Audit Policy is intended to provide incentives to voluntarily identify and disclose violations of statutory and regulatory requirements. Structuring the Audit Program such that noncompliance with voluntary standards, individual state requirements, subjective general duties, or the terms of a single company’s consent agreement are considered “violations,” however, creates an intensely problematic implication that EPA is creating a new, more stringent compliance standard through enforcement leverage.

*i. Questions About Attachment B*

As we have elsewhere stated, API is committed to working with EPA to better understand and improve the Agency’s proposed approach. In order to hopefully continue our dialogue with EPA, API is herein identifying the following important questions:

- Why did EPA not base Attachment B on existing federal regulatory requirements?

- Why does EPA believe that the analyses and corrective actions outlined in Attachment B should be required to demonstrate compliance and receive penalty mitigation?
- With what regulation/requirement does Attachment B attempt to measure compliance?
- Does Attachment B reflect an effort to treat generalized and subjective requirements under the CAA Section 112(r)(1) as specific regulatory comments?
- Would Attachment B be used in an enforcement action to demonstrate either an industry-recognized “good air pollution control practice” or a standard necessary to prevent or minimize hazards?
- Is Attachment B intended to help protect companies from future enforcement actions alleging noncompliance with generalized duties under CAA Section 112(r)(1) or otherwise?
- In what way does Attachment B promote EPA’s stated goal of expanding use of the Audit Policy new owners in the oil and natural gas exploration and production facilities?
- Which precise types of violations must be corrected in 60-days and which are subject to a negotiated schedule?

ii. *Recommendation for Addressing Concerns with Attachment B*

Attachment B imposes assessment and corrective action requirements that bear no relationship to federal regulations promulgated under the CAA. As such, we recommend that EPA decline to finalize Attachment B and refrain from requiring new owners of oil and natural gas exploration and production facilities to undertake non-regulatory measures in order to avail themselves of potential penalty mitigation under the Audit Policy.

We do not believe that new owners of oil and natural gas exploration and production facilities have underutilized the Audit Policy based on difficulties in identifying the federal regulatory requirements on which to assess their compliance. These requirements are found within a handful of NSPS and NESHAPs and readily identifiable. Identifying them in a model agreement does not save time or ease administration of the Audit Program and would only lead to confusion. To the extent that regulatory applicability becomes complex, that complexity is largely driven by differences in regulations based on jurisdiction or local air quality. This variability is part of the CAA and is not an issue that can, or should, be addressed through the Audit Policy. As such, we do not believe that EPA should provide a new draft agreement to replace Attachment B.

If, however, EPA is committed to providing an amended Attachment B, the Agency should base that document exclusively on federal CAA regulations promulgated for those sources. EPA’s

proposed amendments to the National Oil and Natural Gas Federal Implementation Plan (“FIP”) for Indian Country provides a comprehensive list of those requirements.<sup>3</sup> We have reproduced the relevant table from the preamble for those proposed FIP amendments.

<b>40 CFR part and subpart</b>	<b>Title of subpart</b>	<b>Potentially affected sources in the oil and natural gas production and natural gas processing segments of the oil and natural gas sector</b>
<u>40 CFR part 63, subpart DDDDD</u>	National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters	Process heaters
<u>40 CFR part 63, subpart ZZZZ</u>	Subpart ZZZZ—National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	Reciprocating Internal Combustion Engines
<u>40 CFR part 60, subpart III</u>	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines	Compression Ignition Internal Combustion Engines
<u>40 CFR part 60, subpart JJJJ</u>	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines	Spark Ignition Internal Combustion Engines
<u>40 CFR part 60, subpart Kb</u>	Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	Fuel Storage Tanks

<sup>3</sup> 83 Fed. Reg. 20,775 (May 8, 2018).



40 CFR part and subpart	Title of subpart	Potentially affected sources in the oil and natural gas production and natural gas processing segments of the oil and natural gas sector
<u>40 CFR part 60, subpart OOOOa</u>	Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced after September 18, 2015	Storage Vessels, Pneumatic Controllers, Compressors (Reciprocating and Centrifugal), Hydraulically Fractured Oil and Natural Gas Well Completions, Pneumatic Pumps and Fugitive Emissions from Well Sites and Compressor Stations
<u>40 CFR part 63, subpart HH</u>	National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities	Glycol Dehydrators
<u>40 CFR part 60, subpart KKKK</u>	Standards of Performance for New Stationary Combustion Turbines	Combustion Turbines

**b. EPA's Proposed Approach May Undermine Cooperative Federalism and Lead to Duplication and Inefficiency**

As noted above, API does not believe that the one-size-fits-all default language in Attachment B appropriately measures compliance with federal CAA regulations applicable to sources at oil and natural gas exploration and production facilities. We are also concerned however, that this approach would unnecessarily intrude into state regulatory programs and the states' own measures of compliance under state audit programs or otherwise. In particular, the Draft Agreement appears to mirror the Colorado Air Pollution Control Division's ("CAPCD's") Storage Tank and Vapor Control Systems Guidelines.<sup>4</sup> Although CAPCD uses these guidelines to assess compliance with Colorado Regulation Number 7, they remain voluntary guidelines. It is inappropriate to convert voluntary guidelines into mandatory requirements in order to demonstrate compliance and obtain

<sup>4</sup> [https://www.colorado.gov/pacific/sites/default/files/041918\\_StorageTank-presentation.pdf](https://www.colorado.gov/pacific/sites/default/files/041918_StorageTank-presentation.pdf)

penalty mitigation, and it is particularly inappropriate to impose these requirements outside of Colorado.

Moreover, many states operate their own audit programs offering penalty mitigation for companies that voluntarily discover and disclose potential violations of air regulations. These states operate their audit programs pursuant to authority delegated to them by EPA under the CAA. Given this delegated authority, we are concerned that EPA intends to require new owners to navigate EPA's audit process even in states that operate their own audit programs. Rather than affirmatively deferring to states with audit programs authorized under the CAA, the Draft Agreement states that "a company may choose to enter into a parallel audit agreement with a state that has a state audit policy." This language, while brief, suggests that EPA will impose its own Audit Policy requirements on top of any state audit program requirements. Such an approach would certainly not improve the efficiency or expand the use of the Audit Policy among new owners of oil and natural gas exploration and production facilities. To the contrary, this approach would likely lead to duplication, inconsistency, redundancy, and confusion.

As EPA has elsewhere recognized, states are effective stewards of environmental protection and, as the primary issuers and enforcers of air permits, are often in the best position to assess compliance. Rather than imposing the Agency's own prescriptive audit agreement requirements, EPA should view compliance with state audit programs as compliance with EPA's audit requirements. EPA should also decline to impose penalties and offer the same assurances against future enforcement to companies utilizing state audit programs as it would under its own program. Doing so is well within EPA's enforcement discretion and fully consistent with the Agency's obligation to defer to states that appropriately exercise their enforcement authority.<sup>5</sup> Failure to do so, on the other hand, risks further disincentivizing use of the Audit Policy as companies will face the prospect of navigating state audit programs alongside new proscriptive federal requirements that differ not only from state regulations, but from federal regulations as well.

*i. Recommended Approach in States with Audit Programs*

EPA's Audit Policy should yield to state audit policies in order to avoid duplication, inefficiency, and inconsistency. As such, API recommends that EPA amend the Draft Agreement to include express language directing that, if the company is proceeding under a state audit program, EPA will not require the company to navigate EPA's Audit Program as well. Any audit, corrective action, disclosure, or agreement made pursuant to a state audit program should automatically be deemed sufficient by EPA. EPA should also amend the Draft Agreement to explicitly disclaim

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<sup>5</sup> See January 22, 2018 memorandum from Susan Parker Bodine to Regional Administrators; "Interim OECA Guidance on Enhancing Regional-State Planning and Communication on Compliance Assurance Work in Authorized States."

that the Agency will not second-guess state audit policy procedures or outcomes and that EPA will not impose penalties or requirements different from, or in addition to, that which is agreed to by the state. In order to improve the efficiency of the Audit Policy and promote cooperative federalism, EPA should provide the company the same protection from enforcement for disclosed violations that the state provides.

## **II. ADDITIONAL RECOMMENDATIONS**

While API has significant concerns with the Agency's proposed approach to expanding use of the Audit Policy among new owners of oil and natural gas exploration and production facilities, we appreciate EPA's recognition of this problem and support EPA's interest in addressing it. Transactions in the upstream oil and natural gas industry are quite different than transactions involving manufacturing facilities or other industries that utilize the Audit Policy more frequently. Transactions involving manufacturing facilities are much more focused on the infrastructure and equipment, unlike upstream oil and natural gas transactions, the value of which is driven by acreage, reserves, and development rights. To be sure, large amounts of equipment and infrastructure often convey with an oil and natural gas transaction, but unlike a manufacturing entity, the equipment and infrastructure is typically comprised of a large number of smaller sources spread over a large geographic area - often in areas that may be difficult to reach at certain times of the year.

These differences are the main reason new owners of oil and natural gas exploration and production facilities do not use the Audit Policy as extensively as new owners of manufacturing or other industrial facilities. To utilize the Audit Policy, a new owner of a manufacturing facility must assess stationary sources and other regulated equipment that is typically located in one or a few locations within reasonable proximity of each other. Often those sources were constructed and are operated under permits that identify specific emission limits, operating parameters, and maintenance, monitoring, recordkeeping, and reporting requirements. In contrast, a new owner of oil and natural gas exploration and production facilities wishing to use the Audit Policy must often inventory hundreds of individual pieces of equipment over a vast area. Some of this equipment remains stationary, but often equipment used in oil and natural gas exploration and production moves from site to site or is swapped out from one site to another. Some of this equipment may be individually permitted under Title V, thereby providing new owners a discrete list of emission limits and requirements from which to assess compliance. Much of the smaller sources, however, are not individually permitted under Title V. This is not to say that the equipment is unregulated. As noted in Subsection I.a.ii. above, these sources are extensively regulated and, to the consternation of new owners, the regulatory requirements applicable to these sources can change significantly depending on location.

In proposing this approach, it is clear that EPA understands this complexity and recognizes it as an impediment to utilization of the Audit Policy among new owners of oil and natural gas exploration and production facilities. EPA's Draft Agreement seemingly attempted to simplify the multijurisdictional regulatory complexity by proposing to adopt audit requirements that are so stringent they could be applied anywhere. This complexity, however, is inherent in, and essential to, the CAA's multijurisdictional and air quality-based approach to regulation.

New owners of oil and natural gas production facilities do not want the Audit Policy to be simplified by adopting a single, excessively stringent measure of compliance. Adopting the most aggressive requirements imposed by any state or compelled through a consent decree is not an appropriate means of mitigating the complex multijurisdictional approach required by the CAA.

Rather than adopting a one-size-fits-all approach to remove the regulatory complexity, EPA should provide new owners of oil and natural gas facilities more time to identify, disclose, and correct violations. The Draft Agreement provides a framework for new owners to negotiate with EPA to establish manageable timeframes. This approach is helpful and reflects the flexible approach necessitated by the highly varied nature of transactions in the upstream oil and natural gas facility. This approach, however, does not provide new owners any certainty that they will actually be able to negotiate workable deadlines with EPA. Uncertainty over whether an owner will be able to timely complete the elements required by the Audit Policy could continue to undermine its use among new owners of oil and natural gas exploration and production facilities.

API therefore recommends that EPA balance the need for both flexibility and certainty by establishing certain minimum default deadlines that would apply to new owners of oil and natural gas exploration and production facilities. New owners would then be assured of some reasonable minimum timeframe for conducting audits, disclosures, and corrective actions but would remain free to negotiate with EPA to extend those deadlines. We would also recommend that new owners are allowed a period of time following acquisition to assess the site(s) and their operation to determine an appropriate period to evaluate the compliance status. Because EPA recognizes the variability and complexity in these transactions, the Draft Agreement should continue to direct that EPA will not unreasonably deny requests for longer deadlines.

### **III. CONCLUSION**

Once again, API appreciates the opportunity to provide these initial questions and comments, and further appreciates the opportunity to supplement these comments after EPA makes more information available. API is also grateful that EPA is meaningfully exploring opportunities to provide the upstream oil and natural gas industry compliance assistance through a more flexible application of the Audit Policy. While we have concerns with EPA's proposed approach, we are

glad to learn that the Agency is committed to addressing industry concerns. If you have questions or wish to discuss further, please feel free to contact me at [toddm@api.org](mailto:toddm@api.org) or 202.682.8319.

Sincerely,

Matthew Todd

Cc: Susan Bodine, EPA  
Bill Wehrum, EPA  
Patrick Traylor, EPA  
Tim Sullivan, EPA  
Christopher Williams, EPA

Message

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**From:** Wehrum, Bill [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=33D96AE800CF43A3911D94A7130B6C41-WEHRUM, WIL]  
**Sent:** 5/23/2018 6:16:16 PM  
**To:** Nolan, Robert M [robert.m.nolan@exxonmobil.com]  
**Subject:** RE: ExxonMobil Press Release

Thanks Robert.

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Bill Wehrum  
Assistant Administrator  
Office of Air and Radiation  
U.S. Environmental Protection Agency  
(202) 564-7404

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**From:** Nolan, Robert M [mailto:robert.m.nolan@exxonmobil.com]  
**Sent:** Wednesday, May 23, 2018 11:08 AM  
**To:** Wehrum, Bill <Wehrum.Bill@epa.gov>  
**Subject:** ExxonMobil Press Release

Good morning Bill ... I thought you might find this of interest ....

Regard, Robert

202-862-0203 (Office)  
202-302-8665 (Cell)